PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Firestone Industrial Products Company
1700 Firestone Boulevard
Noblesville, Indiana 46060

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 057-5997-00006	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary rubber products manufacturing source.

Responsible Official:	David Soper
Source Address:	1700 Firestone Blvd., Noblesville, Indiana 46060
Mailing Address:	1700 Firestone Blvd., Noblesville, Indiana 46060
Phone Number:	317-773-0650
SIC Code:	3069
County Location:	Hamilton
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) natural gas boiler, identified as emission unit 002, exhausted to stack BS-2 constructed in 1942, using No. 2 fuel oil as backup fuel, rated at 20 million British thermal units per hour.

(b) One (1) Werner-Pfleiderer mixing line, identified as emission unit 004, constructed in 1988, with one (1) mixer exhausting to baghouse J16, one (1) drop mix mill exhausted to baghouse J10 and one (1) uncontrolled slab mill, estimated capacity: 2,500 pounds of compounded rubber per hour.

(c) One (1) Banbury mixing line, identified as emission unit 005, constructed in 1937, with one (1) mixer exhausting to baghouse H16, one (1) uncontrolled drop mix mill and one (1) uncontrolled slab mill, estimated capacity: 2,500 pounds of compounded rubber per hour.

(d) One (1) manual cement dip operations consisting of three (3) tanks, identified as emission unit 010, constructed in 1980, for applying adhesive to metal parts, exhausted to three (3) stacks, all identified as S-31, capacity: 777 metal parts per hour.

(e) One (1) automatic cement dip operation consisting of two (2) tanks, identified as emission unit 011, for applying adhesive to metal parts, exhausted to two (2) stacks, both identified as S-27, constructed in 1985, capacity: 1,995 metal parts per hour.

(f) Five (5) small spray booths, identified as emission units 012 through 016, exhausted to R-24A, R-24B, R-25, S-24 and S-25 respectively, constructed in 1980, for applying adhesive to metal parts, equipped with air atomizer spray guns and dry filters for overspray control, capacity: 88 metal parts per hour, each.

(g) One (1) large cement application booth, identified as emission unit 017, exhausted to T-30, constructed in 1980, for applying adhesive to metal parts, equipped with brushes for hand application, capacity: 88 metal parts per hour.

(h) One (1) product manufacturing operation which consists of sixty-two (62) curing presses, identified as emission units 029 through 080, and 130 through 139, estimated capacity: 1,600 pounds of compounded rubber per hour, total; sixteen (16) vulcanizers, identified as emission units 082 through 096 and emission unit 148, estimated capacity: 900 pounds of compounded rubber per hour, total; building, crimping and assembling operations, estimated capacity: 1,000 pounds of metals and molded rubber parts per hour, 400 pound of calendered gum stock per hour, and 440 pounds of calendered fabric per hour.

(i) One (1) natural gas boiler, identified as emission unit 001A, exhausted to stack BS-1A, constructed in 1998, using No. 2 fuel oil as backup fuel, rated at 31.38 million British thermal units per hour.

(j) One (1) rubber compounding operation, identified as emission unit 003, consisting of weighing and conveying raw materials, equipped with a baghouse and exhausted to M-15, constructed in the 1980s, estimated capacity: 1,530 pounds of rubber per hour, 770 pounds of carbon black per hour, and 200 pounds of pigments per hour.

(k) Two (2) air stripping towers, identified as emission units 008 and 009, exhausted to AS-1 and AS-2, constructed in 1992, capacity: 800 gallons per minute, each.

(l) One (1) swabbing operation, identified as emission unit 081, exhausted to P-1, constructed prior to 1980, capacity: 11,680 gallons of solvent and cement per year.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Six (6) parts washer units, identified as emission units 023 through 028. [326 IAC 8-3-5]

(b) The following emission unit emitting greater than one (1) pound per day, but less than five (5) pounds per day or one (1) ton per year of a single HAP:

One (1) cure oven, identified as emission unit 124, using dibutyl phthalate. [326 IAC 6-3-2]

(c) Two (2) calendering processes equipped with two (2) calendering lines identified as emission units 106 and 107, constructed in 1971 and 1957, respectively, capacity: 2,700 pounds of compounded rubber per hour, total. Also including four (4) calender warmup mills identified as emission units 097 through 100, capacity: 5,400 pounds of compounded rubber per hour, total. [326 IAC 6-3-2]

(d) One (1) extrusion process equipped with five (5) extruder warmup mills, capacity: 1,800 pounds of compounded rubber per hour, total; and three (3) feed extruders, capacity: 900 pounds of compounded rubber per hour. [326 IAC 6-3-2]

(e) One (1) rubber mill mixer, identified as emission unit 007, equipped with a baghouse J10, capacity: 118 pounds of compounded rubber per hour. [326 IAC 6-3-2]

(f) Six (6) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than

or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]

(g) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6.

(h) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.

(i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(j) Paved and unpaved roads and parking lots with public access.

(k) On-site fire and emergency response training approved by the department.

(l) Other emergency equipment as follows: stationary fire pumps.

(m) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kiloPascals measured at 38EC).

(n) A laboratory as defined in 326 IAC 2-7-1(21)(D).

(o) One (1) devulcanizer, identified as emission unit 118.

(p) One (1) cement mix house, identified as emission unit 122.

(q) One (1) No. 2 fuel oil storage tank, identified as emission unit 112.

(r) Two (2) process oil storage tanks, identified as emission units 113 and 114.

(s) Research and Development activities as defined in 326 IAC 2-7-1(21)(E).

(t) Seven (7) repair curing presses, identified as emission units 141 through 147, capacity: 80 pounds of compounded rubber per hour.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22); and

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes

final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of

total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy any records that must be kept under the conditions of this permit;

(c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Particulate Matter Emissions

Pursuant to OP 29-01-94-0150, issued on January 30, 1990, particulate matter emissions shall be controlled according to the roof cleaning plan submitted on November 3, 1987 or a roof cleaning plan approved by IDEM, OAQ. The plan does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). A log of roof cleaning shall be kept and be available for inspection upon request.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector

The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to tho-

roughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.10 Performance Testing [326 IAC 3-6]

(a) All testing used to determine compliance with environmental rules for air emissions shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date of all tests used to determine compliance with environmental rules for air emissions at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports for tests used to determine compliance with environmental rules for air emissions must be received by IDEM, OAQ, within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.13 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.14 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.15 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(c) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.18 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ, when applicable). The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall

be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.

(c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

(f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.

(1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.

(2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.20 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor

vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(a) One (1) natural gas boiler, identified as emission unit 002, exhausted to stack BS-2 constructed in 1942, using No. 2 fuel oil as backup fuel, rated at 20 million British thermal units per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 20 million British thermal unit per hour heat input boiler shall be limited to 0.54 pound per million British thermal unit heat input.

This limitation is based on the following equation:

$$Pt = 0.87/Q^{0.16}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

D.1.2 Sulfur Dioxide (SO_2) [326 IAC 7-1.1-2]

Pursuant to 326 IAC 7-1.1-2, the SO_2 from this boiler shall be limited to five-tenths (0.5) pounds per million British thermal units when operating on distillate oil.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million British thermal units heat input by:

(1) Providing vendor analysis of No. 2 fuel oil delivered, if accompanied by a certification;

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Visible Emissions Notations

(a) When operating on No. 2 fuel oil, visible emission notations of the boiler stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.6 Record Keeping Requirements

(a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below.

(1) Calendar dates covered in the compliance determination period;

(2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;

(3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period, the natural gas fired boiler certification does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34); and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

(4) Fuel supplier certifications;

(5) The name of the fuel supplier; and

(6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

(b) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the boiler stack exhaust once per shift.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

A semi-annual Natural Gas-fired Boiler Certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six month period. The report submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(b) One (1) Werner-Pfleiderer mixing line, identified as emission unit 004, constructed in 1988, with one (1) mixer exhausting to baghouse J16, one (1) drop mix mill exhausted to baghouse J10 and one (1) uncontrolled slab mill, estimated capacity: 2,500 pounds of compounded rubber per hour.

(c) One (1) Banbury mixing line, identified as emission unit 005, constructed in 1937, with one (1) mixer exhausting to baghouse H16, one (1) uncontrolled drop mix mill and one (1) uncontrolled slab mill, estimated capacity: 2,500 pounds of compounded rubber per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2][326 IAC 2-2]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the one (1) mixer at the Werner-Pfleiderer mixing line shall not exceed 4.76 pounds per hour when operating at a process weight rate of 2,500 pounds per hour.

(b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the one (1) drop mix mill at the Werner-Pfleiderer mixing line shall not exceed 4.76 pounds per hour when operating at a process weight rate of 2,500 pounds per hour.

(c) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the one (1) mixer at the Banbury mixing line shall not exceed 4.76 pounds per hour when operating at a process weight rate of 2,500 pounds per hour.

(d) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the one (1) drop mix mill at the Banbury mixing line shall not exceed 4.76 pounds per hour when operating at a process weight rate of 2,500 pounds per hour.

These pound per hour limitations were calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour.

(e) Compliance with these limits will make the total source potential to emit of PM less than 250 tons per year. Therefore, this source is a minor source pursuant to 326 IAC 2-2, PSD.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and all control devices.

Compliance Determination Requirements

D.2.3 Particulate Matter (PM)

(a) The baghouse, J16, connected to the one (1) mixer shall be in operation at all times the mixer at the Werner-Pfleiderer line is in operation.

(b) The baghouse, H16, connected to the one (1) mixer shall be in operation at all times the mixer at the Banbury mixing line is in operation.

(c) The baghouse, J10, connected to the one (1) drop mix mill shall be in operation at all times the one (1) Werner-Pfleiderer mixing line is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.4 Visible Emissions Notations

(a) Daily visible emission notations of the baghouse stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses (J16, H16 and J10) used in conjunction with the mixing lines, at least once weekly when the mixing lines are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 6.0 and 9.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.6 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the mixing operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

(a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhaust.

(b) To document compliance with Condition D.2.5, the Permittee shall maintain the following:

(1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(d) One (1) manual cement dip operations consisting of three (3) tanks, identified as emission unit 010, constructed in 1980, for applying adhesive to metal parts, exhausted to three (3) stacks, all identified as S-31, capacity: 777 metal parts per hour.

(e) One (1) automatic cement dip operation consisting of two (2) tanks, identified as emission unit 011, for applying adhesive to metal parts, exhausted to two (2) stacks, both identified as S-27, constructed in 1985, capacity: 1,995 metal parts per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] [326 IAC 8-2-9]

(a) Any change or modification that increases the potential to emit VOC from the manual cement dip operations, identified as emission unit 010, or from the automatic cement dip operations, identified as emission unit 011, to 25 tons per year or more may cause the facility to become subject to 326 IAC 8-1-6 and shall require prior approval.

(b) Any change or modification that increases the potential to emit VOC from the manual cement dip operations, identified as emission unit 010, or from the automatic cement dip operations, identified as emission unit 011, to twenty-five (25) tons per year or more may cause the facility to become subject to 326 IAC 8-2-9 and shall require prior approval.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(f) Five (5) small spray booths, identified as emission units 012 through 016, exhausted to R-24A, R-24B, R-25, S-24 and S-25 respectively, constructed in 1980, for applying adhesive to metal parts, equipped with air atomizer spray guns and dry filters for overspray control, capacity: 88 metal parts per hour, each.

(g) One (1) large cement application booth, identified as emission unit 017, exhausted to T-30, constructed in 1980, for applying adhesive to metal parts, equipped with brushes for hand application, capacity: 88 metal parts per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the five (5) small spray booths, identified as emission units 012 through 016, shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour

D.4.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] [326 IAC 8-2-9]

(a) Any change or modification that increases the potential to emit VOC from any of the five (5) small spray booths, identified as emission units 012 through 016, or the one (1) large cement application booth, identified as emission unit 017, to 25 tons per year or more may cause the facility to become subject to 326 IAC 8-1-6 and shall require prior approval.

(b) Any change or modification that increases the potential to emit VOC from any of the five (5) small spray booths, identified as emission units 012 through 016, or the one (1) large cement application booth, identified as emission unit 017 to twenty-five (25) tons per year or more may cause the facility to become subject to 326 IAC 8-2-9 and shall require prior approval.

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the five (5) small spray booths and all control devices.

Compliance Determination Requirements

D.4.4 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the five (5) small spray booths, identified as emission units 012 through 016, are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.5 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating spray booth stacks (R-24A, R-24B, R-25, S-24 and S-25) while one (1) or more of the booths exhausting to that stack are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.6 Record Keeping Requirements

(a) To document compliance with Conditions D.4.4 and D.4.5, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5 FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(h) One (1) product manufacturing operation which consists of sixty-two (62) curing presses, identified as emission units 029 through 080, and 130 through 139, estimated capacity: 1,600 pounds of compounded rubber per hour, total; sixteen (16) vulcanizers, identified as emission units 082 through 096 and emission unit 148, estimated capacity: 900 pounds of compounded rubber per hour, total; building, crimping and assembling operations, estimated capacity: 1,000 pounds of metals and molded rubber parts per hour, 400 pound of calendered gum stock per hour, and 440 pounds of calendered fabric per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

Any change or modification that increases the potential to emit VOC from any of the sixty-two (62) curing presses, identified as emission units 029 through 080, and 130 through 139, any of the sixteen (16) vulcanizers, identified as emission units 082 through 096 and 148, to twenty-five (25) tons per year or more may cause the facility to become subject to 326 IAC 8-1-6 and shall require prior approval.

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(i) One (1) natural gas boiler, identified as emission unit 001A, exhausted to stack BS-1A, constructed in 1998, using No. 2 fuel oil as backup fuel, rated at 31.38 million British thermal units per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 31.38 million British thermal unit per hour heat input boiler shall be limited to 0.39 pound per million British thermal unit heat input.

This limitation is based on the following equation is given in 326 IAC 6-2-4:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

D.6.2 Sulfur Dioxide (SO_2) [326 IAC 7-1.1-1] [326 IAC 12-1]

Pursuant to 326 IAC 7-1.1 (SO_2 Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

(a) The SO_2 emissions from the one (1) natural gas boiler, identified as emission unit 001A shall not exceed five tenths (0.5) pounds per million Btu heat input; or

(b) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]

Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

D.6.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirement [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.6.4 Sulfur Dioxide Emissions and Sulfur Content

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options:

(a) Providing vendor analysis of No. 2 fuel oil delivered, if accompanied by a certification; or

(b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.5 Visible Emissions Notations

(a) When operating on No. 2 fuel oil, visible emission notations of the boiler stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.6.6 Record Keeping Requirements

(a) To document compliance with Condition D.6.2, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.

(1) Calendar dates covered in the compliance determination period;

(2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;

(3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period, the natural gas fired boiler certification does not require the certification by the “responsible official”

as defined by 326 IAC 2-7-1(34); and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

(4) Fuel supplier certifications;

(5) The name of the fuel supplier; and

(6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

(b) To document compliance with Condition D.6.5, the Permittee shall maintain records of visible emission notations of the boiler stack exhaust once per shift.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.6.7 Reporting Requirements

A semi-annual Natural Gas Boiler Certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six month period being reported. The report submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.7 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(j) One (1) rubber compounding operation, identified as emission unit 003, consisting of weighing and conveying raw materials, equipped with a baghouse and exhausted to M-15, constructed in the 1980s, estimated capacity: 1,530 pounds of rubber per hour, 770 pounds of carbon black per hour, and 200 pounds of pigments per hour.

(k) Two (2) air stripping towers, identified as emission units 008 and 009, exhausted to AS-1 and AS-2, constructed in 1992, capacity: 800 gallons per minute, each.

(l) One (1) swabbing operation, identified as emission unit 081, exhausted to P-1, constructed prior to 1980, capacity: 11,680 gallons of solvent and cement per year.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the one(1) rubber compounding operation shall not exceed 4.76 pounds per hour when operating at a process weight rate of 2,500 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour

D.7.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.7.3 Particulate Matter (PM)

The baghouse for PM control shall be in operation and control emissions from the rubber compounding operation at all times that the rubber compounding is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.7.4 Visible Emissions Notations

(a) Daily visible emission notations of the baghouse exhausted to M-15 stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.7.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the rubber compounding operation, at least once weekly when the rubber compounding is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 12.0 and 17.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.7.6 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the rubber compounding operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.7.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.7.8 Record Keeping Requirements

(a) To document compliance with Condition D.7.4, the Permittee shall maintain records of daily visible emission notations of the rubber compounding stack exhaust.

(b) To document compliance with Condition D.7.5, the Permittee shall maintain the following:

(1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.7.6, the Permittee shall maintain records of the results of the inspections required under Condition D.7.6 and the dates the vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.8 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

(a) Six (6) parts washer units, identified as emission units 023 through 028. [326 IAC 8-3-5]

(b) The following emission unit emitting greater than one (1) pound per day, but less than five (5) pounds per day or one (1) ton per year of a single HAP:

One (1) cure oven, identified as emission unit 124, using dibutyl phthalate. [326 IAC 6-3-2]

(c) Two (2) calendering processes equipped with two (2) calendering lines identified as emission units 106 and 107, constructed in 1971 and 1957, respectively, capacity: 2,700 pounds of compounded rubber per hour, total. Also including four (4) calender warmup mills identified as emission units 097 through 100, capacity: 5,400 pounds of compounded rubber per hour, total. [326 IAC 6-3-2]

(d) One (1) extrusion process equipped with five (5) extruder warmup mills, capacity: 1,800 pounds of compounded rubber per hour, total; and three (3) feed extruders, capacity: 900 pounds of compounded rubber per hour. [326 IAC 6-3-2]

(e) One (1) rubber mill mixer, identified as emission unit 007, equipped with a baghouse J10, capacity: 118 pounds of compounded rubber per hour. [326 IAC 6-3-2]

(f) Six (6) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.8.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the insignificant activities, such as the slush oven, identified as 124, two (2) calendering processes, identified as 106 and 107, one (1) extrusion process, one (1) rubber mill mixer, and six (6) grinding and machining operations shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour

D.8.2 Volatile Organic Compounds (VOC)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the six (6) parts washer units shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Determination Requirements

D.8.3 Particulate Matter (PM)

The control devices for PM control shall be in operation and control emissions from the insignificant activities exhausting to those control devices when the insignificant activities are in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
AIR COMPLIANCE BRANCH

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Firestone Industrial Products Company
Source Address: 1700 Firestone Blvd., Noblesville, Indiana 46060
Mailing Address: 1700 Firestone Blvd., Noblesville, Indiana 46060
Part 70 Permit No.: T 057-5997-00006

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Firestone Industrial Products Company
Source Address: 1700 Firestone Blvd., Noblesville, Indiana 46060
Mailing Address: 1700 Firestone Blvd., Noblesville, Indiana 46060
Part 70 Permit No.: T 057-5997-00006

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- C The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
AIR COMPLIANCE BRANCH

PART 70 OPERATING PERMIT
NATURAL GAS-FIRED BOILER CERTIFICATION

Source Name: Firestone Industrial Products Company
Source Address: 1700 Firestone Blvd., Noblesville, Indiana 46060
Mailing Address: 1700 Firestone Blvd., Noblesville, Indiana 46060
Part 70 Permit No.: T 057-5997-00006

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Report period
Beginning: _____
Ending: _____

Boiler Affected	Alternate Fuel	Days burning alternate fuel From	To

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Firestone Industrial Products Company
Source Address: 1700 Firestone Blvd., Noblesville, Indiana 46060
Mailing Address: 1700 Firestone Blvd., Noblesville, Indiana 46060
Part 70 Permit No.: T 057-5997-00006

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)**:**	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)**:**	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)**:**	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)**:**	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)**:**	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	**Firestone Industrial Products Company**
Source Location:	**1700 Firestone Blvd., Noblesville, Indiana 46060**
County:	**Hamilton**
SIC Code:	**3069**
Operation Permit No.:	**T 057-5997-00006**
Permit Reviewer:	**CarrieAnn Ortolani**

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Firestone Industrial Products Company relating to the operation of a rubber products manufacturing source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) natural gas boiler, identified as emission unit 002, exhausted to stack BS-2 constructed in 1942, using No. 2 fuel oil as backup fuel, rated at 20 million British thermal units per hour.

(b) One (1) Werner-Pfleiderer mixing line, identified as emission unit 004, constructed in 1988, with one (1) mixer exhausting to baghouse J16, one (1) drop mix mill exhausted to baghouse J10 and one (1) uncontrolled slab mill, estimated capacity: 2,500 pounds of compounded rubber per hour.

(c) One (1) Banbury mixing line, identified as emission unit 005, constructed in 1937, with one (1) mixer exhausting to baghouse H16, one (1) uncontrolled drop mix mill and one (1) uncontrolled slab mill, estimated capacity: 2,500 pounds of compounded rubber per hour.

(d) One (1) manual cement dip operations consisting of three (3) tanks, identified as emission unit 010, constructed in 1980, for applying adhesive to metal parts, exhausted to three (3) stacks, all identified as S-31, capacity: 777 units per hour.

(e) One (1) automatic cement dip operation consisting of two (2) tanks, identified as emission unit 011, for applying adhesive to metal parts, exhausted to two (2) stacks, both identified as S-27, constructed in 1985, capacity: 1,995 units per hour.

(f) Five (5) small spray booths, identified as emission units 012 through 016, exhausted to R-24A, R-24B, R-25, S-24 and S-25, respectively, constructed in 1980, for applying adhesive to metal parts, equipped with air atomizer spray guns and dry filters for overspray control, capacity: 88 units per hour, each.

(g) One (1) large cement application booth, identified as emission unit 017, exhausted to T-30, constructed in 1980, for applying adhesive to metal parts, equipped with bushes for hand application, capacity: 88 units per hour.

(h) One (1) product manufacturing operation which consists of sixty-two (62) curing presses, identified as emission units 029 through 080, and 130 through 139, estimated capacity: 1,600 pounds of compounded rubber per hour, total; sixteen (16) vulcanizers, identified as emission units 082 through 096 and emission unit 148, estimated capacity: 900 pounds of compounded rubber per hour, total; building, crimping and assembling operations, estimated capacity: 1,000 pounds of metals and molded rubber parts per hour, 400 pound of calendered gum stock per hour, and 440 pounds of calendered fabric per hour.

(i) One (1) natural gas boiler, identified as emission unit 001A, exhausted to stack BS-1A, constructed in 1998, using No. 2 fuel oil as backup fuel, rated at 31.38 million British thermal units per hour.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

(j) One (1) rubber compounding operation, identified as emission unit 003, consisting of weighing and conveying raw materials, equipped with a baghouse and exhausted to M-15, constructed in the 1980s, estimated capacity: 1,530 pounds of rubber per hour, 770 pounds of carbon black per hour, and 200 pounds of pigments per hour.

(k) Two (2) air stripping towers, identified as emission units 008 and 009, exhausted to AS-1 and AS-2, constructed in 1992, capacity: 800 gallons per minute, each.

(l) One (1) swabbing operation, identified as emission unit 081, exhausted to P-1, constructed prior to 1980, capacity: 11,680 gallons of solvent and cement per year.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Six (6) parts washer units, identified as emission units 023 through 028.

(b) The following emission unit emitting greater than one (1) pound per day, but less than five (5) pounds per day or one (1) ton per year of a single HAP:

One (1) cure oven, identified as emission unit 124, using dibutyl phthalate.

(c) Two (2) calendering processes equipped with two (2) calendering lines identified as emission units 106 and 107, constructed in 1971 and 1957, respectively, capacity: 2,700 pounds of compounded rubber per hour, total. Also including four (4) calender warmup mills identified as emission units 097 through 100, capacity: 5,400 pounds of compounded rubber per hour, total.

(d) One (1) extrusion process equipped with five (5) extruder warmup mills, capacity: 1,800 pounds of compounded rubber per hour, total; and three (3) feed extruders, capacity: 900 pounds of compounded rubber per hour, total.

(e) One (1) rubber mill mixer, identified as emission unit 007, equipped with a baghouse J10, capacity: 118 pounds of compounded rubber per hour.

(f) Six (6) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(g) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6.

(h) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.

(i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(j) Paved and unpaved roads and parking lots with public access.

(k) On-site fire and emergency response training approved by the department.

(l) Other emergency equipment as follows: stationary fire pumps.

(m) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38EC).

(n) A laboratory as defined in 326 IAC 2-7-1(21)(D).

(o) One (1) devulcanizer, identified as emission unit 118.

(p) One (1) cement mix house, identified as emission unit 122.

(q) One (1) No. 2 fuel oil storage tank, identified as emission unit 112.

(r) Two (2) process oil storage tanks, identified as emission units 113 and 114.

(s) Research and Development activities as defined in 326 IAC 2-7-1(21)(E).

(t) Seven (7) repair curing presses, identified as emission units 141 through 147, capacity: 80 pounds of compounded rubber per hour.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) OP 29-01-86-0108, issued on May 28, 1982;

(b) OP 29-01-86-0105, issued on May 28, 1982;

(c) OP 29-01-86-0106, issued on May 28, 1982;

(d) OP 29-01-86-0107, issued on May 28, 1982;

(e) Registration (no number), issued on July 9, 1982;

(f) OP 29-01-94-0144, issued on January 30, 1990;

(g) OP 29-01-94-0145, issued on January 30, 1990;

(h) OP 29-01-94-0146, issued on January 30, 1990;

(i) OP 29-01-94-0147, issued on January 30, 1990;

(j) OP 29-01-94-0148, issued on January 30, 1990;

(k) OP 29-01-94-0150, issued on January 30, 1990;

(l) OP 29-01-94-0149, issued on January 30, 1990;

(m) Registration CP 057-2604-00006, issued on October 29, 1992;

(n) CP 057-5400-00006, issued on April 10, 1997; and

(o) CP 057-9551-00006, issued on June 15, 1998.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

(a) CP 057-5400-00006, issued on April 10,1997

Condition 9: Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), The volatile organic compound (VOC) content of coatings applied to plant equipment shall be limited on a daily weighted volumetric average, to: for Air Dried Coat, 3.5 pounds per gallon, less water, and for Extreme Performance Coat, 3.5 pounds per gallon, less water. Records of the daily volume weighted average of the VOC content of the coatings applied to the metal substrates shall be maintained for a minimum period of 36 months and made available upon request of the Office of Air Management (OAM). The daily volume weighted average shall be calculated.

Condition 10: Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Condition 11: Pursuant to 326 IAC 2-1-3(i)(8), records of surface coating quantities and organic solvent contents shall be maintained for a minimum period of 36 months and made available upon request of the Office of Air Management (OAM). Any change or modification which may increase potential emissions to 250 tons per year from the equipment covered in this permit shall obtain a PSD permit pursuant to 326 IAC 2-2 before such a change may occur.

Reason not incorporated: The maintenance coating booth has been removed, and 326 IAC 8-2-9 is not applicable to any other facility at this source.

(b) OP 29-01-94-0145, issued on January 30, 1990

Condition 5: Sulfur dioxide emissions from the boiler shall be limited to six (6) pounds per million British Thermal Units of heat input pursuant to 326 IAC 7-1

Reason not incorporated: A six (6) pound per million British Thermal Units limit is for coal combustion facilities; however, the combustion facilities at this source operate on natural gas and No. 2 fuel oil, only. Therefore, the SO_2 emissions will be limited to five-tenths (0.5) pound per million British thermal for No. 2 fuel oil combustion.

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on May 31, 1996. Additional information was received on July 19, 1996, July 29, 1996, August 6, 1996, August 16, 1996, August 21, 1996, August 19, 1996, August 26, 1996, October 3, 1996, October 18, 1996, June 9, 2000, July 28, 2000, and August 17, 2000.

A notice of completeness letter was mailed to the source on July 24, 1996.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 9 of 9).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	**Potential To Emit** (tons/year)
PM	312
PM_{10}	313
SO_2	114
VOC	239
CO	18.9
NO_X	32.1

Note: For the purpose of determining Title V applicability for particulates, PM_{10}, not PM, is the regulated pollutant in consideration.

HAPs	**Potential To Emit** (tons/year)
Methanol	0.699
Hexane	7.97
Xylenes	15.3
Ethyl benzene	3.66
MEK	25.3
MIBK	4.26
Trichloroethylene	0.536
Toluene	1.89
Arsenic	0.0009
Beryllium	0.0007
Cadmium	0.0008
Chromium	0.003
Lead	0.002
Mercury	0.0007
Manganese	0.001
Nickel	0.002
Selenium	0.003
Benzene	0.085
Dichlorobenzene	0.0003
Formaldehyde	0.017
Epichlorohydrin	0.007

HAPs	Potential To Emit (tons/year)
1,1,1 Trichloroethane	2.50
1,4 Dichlorobenzene	0.0005
2-Butanone	0.083
Acetylaldehyde	0.001
Acetophenone	0.017
Aniline	0.034
bis(2-Ethylhexyl)phthalate	0.126
Carbon Disulfide	30.1
Carbonyl Sulfide	0.472
Chloroethane	0.014
Chloromethane	0.065
Cumene	0.007
Di-n-butylphthalate	0.002
Dibenzofuran	0.0004
Dimethylphthalate	0.001
Isooctane	0.002
Methylene Chloride	1.11
Naphthalene	0.007
o-Toluidine	0.015
Phenol	0.092
2-Methylphenol	0.00003
Biphenyl	0.0001
Styrene	0.001
t-Butyl Methyl Ether	0.00003
4-Methyl-2-pentanone	0.011
Ethylacrylate	0.113
Tetrachloroethene	0.180
TOTAL	96.9

(a) The potentials to emit (as defined in 326 IAC 2-1.1-1(16)) of PM_{10}, VOC and SO_2 are equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1998 OAM emission data. The actual NO_X emissions are now lower because one (1) boiler has been removed from this source.

Pollutant	**Actual Emissions** (tons/year)
PM	not reported
PM_{10}	11.2
SO_2	0.439
VOC	49.8
CO	25.6
NO_X	102
HAPs	not reported

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 Operating Permit.

	Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Boiler (002)	1.25	1.25	44.4	0.482	7.36	12.5	0.166
Werner-Pfleiderer Mixing Line (004)	18.0	18.0	0.00	16.8	0.00	0.00	3.85
Banbury Mixing Line (005)	19.1	19.1	0.00	16.8	0.00	0.00	3.85
Manual Cement Dip (010)	0.00	0.00	0.00	2.69	0.00	0.00	2.71
Automatic Cement Dip (011)	0.00	0.00	0.00	13.4	0.00	0.00	13.5

	Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Five (5) Small Spray Booths (012 - 016)	0.244	0.244	0.00	29.0	0.00	0.00	29.0
One (1) Large Cement Spray Booth (017)	0.00	0.00	0.00	0.870	0.00	0.00	0.730
One (1) Product Manufacturing Operation (029 - 080, 130 - 139, 082 - 096 and 148)	0.00	0.00	0.00	71.0	0.00	0.00	33.3
Boiler (001A)	1.96	1.96	69.7	0.756	11.5	19.6	0.260
Rubber Compounding Operation (003)	2.70	2.70	0.00	0.00	0.00	0.00	0.00
Two (2) Air Stripping Towers (008 and 009)	0.00	0.00	0.00	23.8	0.00	0.00	0.00
Swabbing Operation (081)	0.00	0.00	0.00	36.5	0.00	0.00	5.04
Insignificant Activities	1.00	1.00	0.00	30.0	0.00	0.00	5.00
Total Emissions	44.3	44.3	114	239	18.9	32.1	97.4

County Attainment Status

The source is located in Hamilton County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_X) are precursors for the

formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Hamilton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Hamilton County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) The (1) natural gas fired boiler, using No. 2 fuel oil as backup fuel, identified as emission unit 002, is not subject to the requirements of the New Source Performance Standards, 326 IAC 12, (40 CFR 60.40, 60.40a, 60.40b, and 60.40c), Subparts D, Da, Db, and Dc, because the boiler was constructed prior to August 17, 1971, which is the earliest applicability date of these rules.

(b) The one (1) natural gas fired boiler, using No. 2 fuel oil as backup fuel, identified as emission unit 001A, is not subject to the requirements of the New Source Performance Standards, 326 IAC 12, (40 CFR 60.40, 60.40a, and 60.40b), Subparts D, Da, and Db, because the boiler has a capacity less than 100 million British thermal units per hour. The one (1) natural gas fired boiler, using No. 2 fuel oil as backup fuel, identified as emission unit 001A, is subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c), Subpart Dc, because the boiler has a capacity less than 100 million British thermal units per hour and greater than 10 million British thermal units per hour and the boiler was constructed after June 9, 1989. Pursuant this rule, the sulfur content of the fuel oil shall not exceed five-tenths pound (0.5) per million British thermal units of heat input or five-tenths percent (0.5%) SO_2 by weight. Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

(c) The one (1) No. 2 fuel oil storage tank, identified as emission unit 002, is not subject to the requirements of the New Source Performance Standards, 326 IAC 12, (40 CFR 60.114 and

60.114b), Subparts K and Kb because it was constructed after May 19, 1978 and prior to July 23, 1984. The one (1) No. 2 fuel oil storage tank, identified as emission unit 112, is not subject to the requirements of the New Source Performance Standards, 326 IAC 12, (40 CFR 60.114a), Subpart Ka because it has a capacity of 25,000 gallons, which is less than 40,000 gallons.

(d) The one (1) process oil storage tank, identified as emission unit 113, is not subject to the requirements of the New Source Performance Standards, 326 IAC 12, (40 CFR 60.114a and 60.114b), Subparts Ka and Kb because it was constructed prior to May 19, 1978. The one (1) process oil storage tank, identified as emission unit 113, is not subject to the requirements of the New Source Performance Standards, 326 IAC 12, (40 CFR 60.114), Subpart K because it has a capacity of 15,000 gallons, which is less than 40,000 gallons.

(e) The one (1) process oil storage tank, identified as emission unit 114, is not subject to the requirements of the New Source Performance Standards, 326 IAC 12, (40 CFR 60.114 and 60.114a), Subparts K and Ka because it was constructed after July 23, 1984. The one (1) process oil storage tank, identified as emission unit 114, is not subject to the requirements of the New Source Performance Standards, 326 IAC 12, (40 CFR 60.114b), Subpart Kb because it has a capacity of 27.9 cubic meters, which is less than 40 cubic meters.

(f) The one (1) swabbing operation, identified as emission unit 081, which is a solvent cleaning operation, is not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63.460), Subpart T, because it does not use any halogenated solvents.

(g) The insignificant degreasing operations are not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63.460), Subpart T, because the operations consist of only aqueous alkaline cleaners.

(h) Although one (1) of the six (6) parts washer units, identified as emission units 023 through 028, uses a solvent containing halogenated HAPs, the total concentration of halogenated HAPs is less than five percent (5%) by weight. Therefore, the requirements of 40 CFR Part 63.460, Subpart T, are not applicable to any of the parts washers.

(i) This source is not subject to the requirements of the New Source Performance Standards, 326 IAC 12, (40 CFR 60.541), Subpart BBB because this source manufactures rubber air springs, not rubber tires.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

Since the potential to emit after controls of each criteria pollutant is less than 250 tons per year, the source is not a major source pursuant to 326 IAC 2-2, Prevention of Significant Deterioration, and the requirements of 326 IAC 2-2 are not applicable.

326 IAC 2-4.1-1 (New Source Toxics Control)

Since all facilities, with the exception of one (1) boiler, were constructed prior to July 27, 1997 and the one (1) boiler constructed after July 27, 1997 is not a major source of hazardous air pollutants, the requirements of 326 IAC 2-4.1-1, New Source Toxics Control, are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year) of SO_2 and VOC. Pursuant to this rule, the owner/ operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

Pursuant to OP 29-01-94-0150, issued on January 30, 1990, the roof cleaning plan, as detailed in a November 3, 1987 letter from Mr. A.P. Pustinger, Environmental Engineer, to Mr. Andy Cate, OAM, be followed. A log of roof cleaning shall be kept and be available for inspection upon request. This plan was developed as a result of a compliant IDEM received in October 1987.

State Rule Applicability - Individual Facilities

326 IAC 6-2-2 (Particulate Emissions Limitations for Sources of Indirect Heating Facilities Constructed prior to September 21, 1983 in Specified Counties)

The one (1) boiler, identified as emission unit 002, constructed prior to September 21, 1983, in Hamilton County must comply with requirement of 326 IAC 6-2-2. The emission limitation is based on the following equation given in 326 IAC 6-2-2:

$$Pt = 0.87/Q^{0.16}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

The heat input capacities of the boiler is 20.0 million British thermal units per hour.

$Pt = 0.87/(20)^{0.16} = 0.54$ lb/MMBtu heat input

Based on Appendix A, the potential PM emission rate is larger when using No. 2 fuel oil, and is:

1.25 tons/yr × (2000 lbs/ton / 8760 hrs/yr) = 0.285 lb/hr
(0.285 lb/hr / 20.0 MMBtu/hr) = 0.014 lb PM per MMBtu

Therefore, the one (1) boiler, 002, constructed in 1942, will comply with this rule.

326 IAC 6-2-4 (Particulate Emissions Limitations for Facilities Constructed after September 21, 1983)

The one (1) boiler, identified as 001A, constructed after September 21, 1983, in Hamilton County, must comply with the requirements of 326 IAC 6-2-4. The emission limitations are based on the following equation is given in 326 IAC 6-2-4:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

The heat input capacity of the one (1) boiler is 31.38 million British thermal units per hour. There was one (1) boiler rated at 20.0 million British thermal units per hour in operation when this boiler was constructed.

$Pt = 1.09/(51.38)^{0.26} = 0.39$ lb/MMBtu heat input

Based on Appendix A, the potential PM emission rate is greater when using No. 2 fuel oil, and is:

1.96 tons/yr × (2000 lbs/ton / 8760 hrs/yr) = 0.448 lb/hr
(0.448 lb/hr / 31.38 MMBtu/hr) = 0.014 lb PM per MMBtu

Therefore, the one (1) boiler, 001A, constructed in 1998, will comply with this rule.

326 IAC 6-3-2 (Process Operations)

(a) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the five (5) small spray booths, identified as emission units 012 through 016, and the one (1) large cement application booth, identified as emission unit 017, shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour, and

P = process weight rate in tons per hour

The dry filters shall be in operation at all times the spray booths are in operation, in order to comply with this limit.

(b) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the insignificant activities, such as the cure oven, identified as 124, two (2) calendering processes, identified as 106 and 107, one (1) extrusion process, one (1) rubber mill mixer, and six (6) grinding and machining operations shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour

The dry filters shall be in operation at all times the five (5) small spray booths are in operation, in order to comply with this limit.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 the source must comply with the following PM limitations. Compliance with this rule will also make the source a minor source pursuant to 326 IAC 2-2, PSD, and the requirements of that rule are not applicable.

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the one (1) mixer at the Werner-Pfleiderer mixing line shall not exceed 4.76 pounds per hour when operating at a process weight rate of 2,500 pounds per hour.

The baghouse, J16, connected to the one (1) mixer shall be in operation at all times the mixer at the Werner-Pfleiderer line is in operation, in order to comply with this limit. The PM emissions from the mixer after controls is 2.06 pounds per hour which is less than the allowable PM emission rate of 4.76 pounds per hour. Therefore, the mixer is in compliance with this rule.

(b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the one (1) drop mix mill at the Werner-Pfleiderer mixing line shall not exceed 4.76 pounds per hour when operating at a process weight rate of 2,500 pounds per hour.

The baghouse, J10, connected to the one (1) drop mix mill shall be in operation at all times the drop mix mill at the Werner-Pfleiderer line is in operation, in order to comply with this limit. The PM emissions from the drop mix mill after controls is 2.06 pounds per hour which is less than the allowable PM emission rate of 4.76 pounds per hour. Therefore, the drop mix mill is in compliance with this rule.

(c) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the one (1) mixer at the Banbury mixing line shall not exceed 4.76 pounds per hour when operating at a process weight rate of 2,500 pounds per hour.

The baghouse, H16, connected to the one (1) mixer shall be in operation at all times the mixer at the Banbury mixing line is in operation, in order to comply with this limit. The PM emissions from the mixer after controls is 2.06 pounds per hour which is less than the allowable PM emission rate of 4.76 pounds per hour. Therefore, the mixer is in compliance

with this rule.

(d) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the one (1) drop mix mill at the Banbury mixing line shall not exceed 4.76 pounds per hour when operating at a process weight rate of 2,500 pounds per hour.

The uncontrolled PM emissions from the drop mix mill is 2.31 pounds per hour which is less than the allowable PM emission rate of 4.76 pounds per hour. Therefore, the drop mix mill is in compliance with this rule.

(e) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the one (1) rubber compounding operation shall not exceed 4.76 pounds per hour when operating at a process weight rate of 2,500 pounds per hour.

The baghouse exhausting to M-15, connected to the one (1) rubber compounding operation shall be in operation at all times the rubber compounding operation is in operation, in order to comply with this limit. The PM emissions from the rubber compounding operation after controls is 0.617 pounds per hour which is less than the allowable PM emission rate of 4.76 pounds per hour. Therefore, the rubber compounding operation is in compliance with this rule.

326 IAC 7 (Sulfur Dioxide Emissions Limitations)

Since the potential to emit SO_2 from each of the two (2) boilers is greater than twenty five (25) tons per year, when operating on No. 2 fuel oil, the requirements of 326 IAC 7-1.1-2, Sulfur Dioxide Emission Limitations are applicable. Pursuant to this rule, the SO_2 from each of the two (2) boilers is limited to five-tenths (0.5) pounds per million British thermal units when operating on distillate oil. In order to comply with this rule, the weight percent sulfur shall not exceed five-tenths percent (0.5%). According to the information supplied in the application, the two (2) boilers will comply with this rule.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

(a) The potential to emit VOC from the total of all facilities in the Werner-Pfleiderer mixing line, identified as emission unit 004, is 16.8 tons per year. Since the potential to emit VOC is less than twenty five (25) tons per year, the requirements of 326 IAC 8-1-6 do not apply.

(b) The potential to emit VOC from the total of all facilities in the Banbury mixing line, identified as emission unit 005 and constructed in 1937, is 16.8 tons per year. Since the potential to emit VOC is less than twenty five (25) tons per year and the Banbury mixing line was constructed prior to 1980, the requirements of 326 IAC 8-1-6 do not apply.

(c) The potential to emit VOC from the manual cement dip operations, identified as emission unit 010, is 2.69 tons per year. Since the potential to emit VOC is less than twenty five (25) tons per year, the requirements of 326 IAC 8-1-6 do not apply.

(d) The potential to emit VOC from the automatic cement dip operations, identified as emission unit 011, is 13.4 tons per year. Since the potential to emit VOC is less than twenty five (25) tons per year, the requirements of 326 IAC 8-1-6 do not apply.

(e) The potential to emit VOC from the five (5) small spray booths, identified as emission units 012 through 016, is 29.0 tons per year. Since each small spray booth operates independently of the others, the spray booths are considered separate facilities. Firestone Industrial

Products Company indicated that the total potential to emit of the five (5) small spray booths is divided equally among the booths. Therefore, the potential to emit VOC at each booth is 5.8 tons per year, which less than twenty five (25) tons per year, and the requirements of 326 IAC 8-1-6 are not applicable.

(f) The potential to emit VOC from the large cement application booth, identified as emission unit 017, is 0.870 tons per year. Since the potential to emit VOC is less than twenty five (25) tons per year, the requirements of 326 IAC 8-1-6 do not apply.

(g) The potential to emit VOC from the total of all curing and vulcanizing at the one (1) product manufacturing operation is 71.0 tons per year. Since all curing and vulcanizing operates independently of the others, the curing units and vulcanizers are considered separate facilities. The potential to emit VOC from the vulcanizers (082-096 or 148) is less than twenty five (25) tons per year. Firestone Industrial Products Company indicated that the expected maximum rubber throughput at any one (1) press is 60 pounds per hour. Using the draft AP-42 emission factor of 6.68E-03 pounds of VOC per pound of rubber, the expected maximum emissions from any one (1) curing press is 1.76 tons per year (60 lbs/hr x 6.68E-3 lb VOC/lb rubber x 8,760 hrs/yr / 2,000 lbs/hr = 1.76 tons per year). Therefore, the potential to emit VOC from each vulcanizer and each curing press is less than 25 tons per year and the requirements of 326 IAC 8-1-6 are not applicable.

(h) The potential to emit VOC from the total of the two (2) air stripping towers, identified as emission units 008 and 009) is 23.8 tons per year. Since the potential to emit VOC is less than twenty five (25) tons per year, the requirements of 326 IAC 8-1-6 do not apply.

(i) The swabbing operation, identified as emission unit 081, was constructed prior to 1980. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

(a) The potential to emit VOC from the manual cement dip operations, identified as emission unit 010, is 2.69 tons per year. Since the potential to emit VOC is less than twenty five (25) tons per year and the manual cement dip operations were constructed prior to July 1, 1990, the requirements of 326 IAC 8-2-9 do not apply.

(b) The potential to emit VOC from the automatic cement dip operations, identified as emission unit 011, is 13.4 tons per year. Since the potential to emit VOC is less than twenty five (25) tons per year and the automatic cement dip operations were constructed prior to July 1, 1990, the requirements of 326 IAC 8-2-9 do not apply.

(c) The potential to emit VOC from the five (5) small spray booths, identified as emission units 012 through 016, is 29.0 tons per year. Since each small spray booth operates independently of the others, the spray booths are considered separate facilities. Firestone Industrial Products Company indicated that the total potential to emit of the five (5) small spray booths is divided equally among the booths. Therefore, the potential to emit VOC at each booth is 5.8 tons per year, which less than twenty five (25) tons per year. Since the potential to emit VOC is less than twenty-five (25) tons per year and the booths were constructed prior to July 1, 1990, and the requirements of 326 IAC 8-2-9 are not applicable.

(d) The potential to emit VOC from the large cement application booth, identified as emission unit 017, is 0.870 tons per year. Since the potential to emit VOC is less than twenty five (25) tons per year and the large cement spray booth was constructed prior to July 1, 1990, the requirements of 326 IAC 8-2-9 do not apply.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

(a) The swabbing operations were constructed prior to 1980. Therefore, the requirements of 326 IAC 8-3 do not apply.

(b) The insignificant degreasing operations use only aqueous alkaline cleaners. Therefore, the requirements of 326 IAC 8-3 are not applicable.

(c) The six (6) parts washers were constructed in 1994. Therefore, the requirements of 326 IAC 8-3-5, Organic Solvent Degreasing Operations: Cold Cleaner Degreaser Operation and Control are applicable.

(1) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(A) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(i) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));

(ii) The solvent is agitated; or

(iii) The solvent is heated.

(B) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(C) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(D) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(E) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):

(i) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(ii) A water cover when solvent is used is insoluble in, and heavier than, water.

(iii) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(2) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(A) Close the cover whenever articles are not being handled in the degreaser.

(B) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(C) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

326 IAC 8-6 (Organic Solvent Emission Limitations)

Since the one (1) swabbing operation has a potential to emit less than one hundred (100) tons per year of VOC, the requirements of 326 IAC 8-6-1 do not apply to this source.

Testing Requirements

There are no testing requirements in this permit.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) The one (1) natural gas boiler, identified as emission unit 002, has applicable compliance monitoring conditions as specified below:

When operating on No. 2 fuel oil, visible emission notations of the boiler stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating) and 326 IAC 2-7 (Part 70).

(b) The one (1) Werner-Pfleiderer mixing line, identified as emission unit 004, and one (1) Banbury mixing line, identified as emission unit 005, have applicable compliance monitoring conditions as specified below:

(1) Daily visible emission notations of the baghouse stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(2) The Permittee shall record the total static pressure drop across the baghouses (J16, H16 and J10) used in conjunction with the mixing lines, at least once weekly when the mixing lines are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 6.0 and 9.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

(3) An inspection shall be performed each calender quarter of all bags controlling the mixing operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

(4) In the event that bag failure has been observed:

(A) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(B) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouse for the mixing lines must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70), and to make 326 IAC 2-2 (PSD) not applicable.

(c) The five (5) small cement spray booths, identified as emission units 012 through 016, have applicable compliance monitoring conditions as specified below:

(1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating spray booth stacks (R-24A, R-24B, R-25, S-24, and S-25) while one (1) or more of the booths operating to that stack are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the five (5) small spray booths must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

(d) The one (1) natural gas boiler, identified as emission unit 001A, has applicable compliance monitoring conditions as specified below:

When operating on No. 2 fuel oil, visible emission notations of the boiler stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating) and 326 IAC 2-7 (Part 70).

(e) The one (1) rubber compounding operation, identified as emission unit 003, has applicable compliance monitoring conditions as specified below:

(1) Daily visible emission notations of the baghouse exhausted to M-15 stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(2) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the rubber compounding operation, at least once weekly when the rubber compounding is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 12.0 and 17.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

(3) An inspection shall be performed each calender quarter of all bags controlling the rubber compounding operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

(4) In the event that bag failure has been observed:

(A) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(B) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouse for the rubber compounding must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70), and to make 326 IAC 2-2 (PSD) not applicable.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

(b) See pages 2, 4, 5, 7 and 9 of 9 of Appendix A for detailed air toxic calculations.

Conclusion

The operation of this rubber products manufacturing source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 057-5997-00006.**

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name: **Firestone Industrial Products Company**
Source Location: **1700 Firestone Blvd., Noblesville, Indiana 46060**
County: **Hamilton**
SIC Code: **3069**
Operation Permit No.: **T 057-5997-00006**
Permit Reviewer: **CarrieAnn Ortolani**

On November 8, 2000, the Office of Air Quality (OAQ) had a notice published in the Daily Ledger, Noblesville, Indiana, stating that Firestone Industrial Products Company had applied for a Part 70 Operating Permit to operate a rubber products manufacturing source with baghouses and dry filters as controls. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

On December 7, 2000, Dave E. Soper, Plant Manager, Firestone Industrial Products Company, submitted comments on the proposed Part 70 Operating Permit. The comments are as follows (The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded.**):

Section A Source Summary

Comment 1:

A.2(g): The large cement application booth is equipped with brushes, not bushes.

Response 1:

Item (g) in Section A.2 and in the Facility Description in Section D.4 is corrected as follows:

(g) One (1) large cement application booth, identified as emission unit 017, exhausted to T-30, constructed in 1980, for applying adhesive to metal parts, equipped with ~~bushes~~ **brushes** for hand application, capacity: 88 units per hour.

Comment 2:

A.2(b, c, h, j): As requested in FIP's comments to MES Co., Inc. (MES) dated October 2, 2000, FIP requests that capacities be removed from these process descriptions. Capacities for rubber mixing and production activities have large variances due to mixing cycle lengths and cure times. FIP recommends operational flexibility on these units to adjust production rates as needed based on rubber reformulations, mixing requirements and cure times. FIP will not exceed PM and VOC emissions limitations as a result of this operational flexibility.

Response 2:

The maximum capacities listed in the emission unit descriptions are not required to be in the Title V Operating Permit, however, this information is needed by IDEM OAQ in order to completely assess the source's potential to emit. The process specific emissions limitations identified in

Section D of the permit are often determined from this information. If these capacities are not accurate, the source is required to notify IDEM OAQ since this may change the applicability of the air permitting rules, and may result in an amendment or modification to the permit. Since these capacities are estimates of the maximum capacity, the permit reads "estimated capacity" in order to clarify the flexibility of the manufacturing capabilities. The production rate is not limited to the capacity listed. However, as indicated in the beginning of Section A, "The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application." Since the capacities listed were given as the best estimate of the maximum capacity, no changes will be made to the permit at this time.

Comment 3:

A.3(g-s): As stated in FIP's comments to MES dated October 2, 2000, the following insignificant activities, which were reported in FIP's response to Notice of Deficiency (NOD) No. 1, should be included in Section A.3.

(g) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1 percent by volume.

(h) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(i) Paved and unpaved roads and parking lots with public access.

(j) On-site fire and emergency response training approved by the department.

(k) Other emergency equipment as follows: stationary fire pumps.

(l) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kiloPascals measured at 38ºC).

(m) A laboratory as defined in 326 IAC 2-7-1(21)(D).

(n) Two devulcanizers, identified as emission unit 118 and 140.

(o) One cement mix house, identified as emission unit 122.

(p) One no. 2 fuel oil storage tank, identified as emission unit 112.

(q) Two process oil storage tanks, identified as emission units 113 and 114.

(r) Research and Development activities as defined in 326 IAC 2-7-1(21)(E).

(s) Seven repair curing presses, identified as emission units 141 through 147, capacity: 80 pounds of compounded rubber per hour, total.

Response 3:

As stated in Section A.3, this section lists only specifically regulated insignificant activities. The insignificant activities that were listed in the TSD and not in the permit were those that are not subject to specific rules. However, all insignificant activities can be listed in the permit. The insignificant activities which are subject to a particular rule will be followed by the rule cite. Section A.3 is revised as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities ~~which are specifically regulated~~, as defined in 326 IAC 2-7-1(21):

(a) Six (6) parts washer units, identified as emission units 023 through 028. **[326 IAC 8-3-5]**

(b) The following emission unit emitting greater than one (1) pound per day, but less than five (5) pounds per day or one (1) ton per year of a single HAP:

One (1) cure oven, identified as emission unit 124, using dibutyl phthalate. **[326 IAC 6-3-2]**

(c) Two (2) calendering processes equipped with two (2) calendering lines identified as emission units 106 and 107, constructed in 1971 and 1957, respectively, capacity: 2,700 pounds of compounded rubber per hour, total. Also including four (4) calender warmup mills identified as emission units 097 through 100, capacity: 5,400 pounds of compounded rubber per hour, total. **[326 IAC 6-3-2]**

(d) One (1) extrusion process equipped with five (5) extruder warmup mills, capacity: 1,800 pounds of compounded rubber per hour, total; and three (3) feed extruders, capacity: 900 pounds of compounded rubber per hour. **[326 IAC 6-3-2]**

(e) One (1) rubber mill mixer, identified as emission unit 007, equipped with a baghouse J10, capacity: 118 pounds of compounded rubber per hour. **[326 IAC 6-3-2]**

(f) Six (6) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. **[326 IAC 6-3-2]**

(g) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6.

(h) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.

(i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(j) Paved and unpaved roads and parking lots with public access.

(k) On-site fire and emergency response training approved by the department.

(l) Other emergency equipment as follows: stationary fire pumps.

(m) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38EC).

(n) A laboratory as defined in 326 IAC 2-7-1(21)(D).

(o) One (1) devulcanizer, identified as emission unit 118.

(p) One (1) cement mix house, identified as emission unit 122.

(q) One (1) No. 2 fuel oil storage tank, identified as emission unit 112.

(r) Two (2) process oil storage tanks, identified as emission units 113 and 114.

(s) Research and Development activities as defined in 326 IAC 2-7-1(21)(E).

(t) Seven (7) repair curing presses, identified as emission units 141 through 147, capacity: 80 pounds of compounded rubber per hour.

Comment 4:

A.4(b): As stated in the comments to MES dated October 2, 2000, FIP is not a specifically listed source; therefore, this section should be rewritten as "It is a major source requiring permitting as designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 Applicability)".

Response 4:

Since this source is a major source based on the Part 70 definition of a major source, and is not listed as an exempt source category, Part 70 is applicable according to 40 CFR 70.3 (a)(1). There is no change in the language of A.4(b).

Section B General Conditions

Comment 5:

None of the Indiana regulations referenced in this section are part of Indiana's approved state implementation plan (SIP) and are therefore not federally enforceable. All conditions of this section are not federally enforceable which should be stated as such in the Title V permit.

Response 5:

The regulations referenced in Section B are all part of 326 IAC 2-7, Part 70. Indiana has interim approval from the Environmental Protection Agency (EPA) for 326 IAC 2-7, which expires on December 1, 2001. Therefore, all requirements of 326 IAC 2-7, Part 70, are federally enforceable.

Section C Emission Limitations and Standards

Comment 6:

The majority of the Indiana regulations referenced in this section are not part of Indiana's approved SIP and are therefore not federally enforceable. The following sections and associated regulations

are not federally enforceable which should be stated as such in the Title V Permit.

C.6 326 IAC 6-5

C.7 326 IAC 2-7-6

C.9 326 IAC 14-10 and 326 IAC 18

C.10 326 IAC 3-6

C.11 326 IAC 2-1.1-11

C.12 326 IAC 2-7-5 and 326 IAC 2-7-6

C.13 326 IAC 2-7-5

C.16 326 IAC 1-5-2 and 326 IAC 1-5-3

C.17 326 IAC 2-7-5

C.18 326 IAC 2-7-5 and 326 IAC 2-7-6

C.19 326 IAC 2-7-5 and 326 IAC 2-7-6

C.20 326 IAC 2-7-5 and 326 IAC 2-7-19

C.21 326 IAC 2-7-5 and 326 IAC 2-7-6

C.22 326 IAC 2-7-5 and 326 IAC 2-1.1-11

C.23 326 IAC 22-1

Response 6:

(a) The requirements of 326 IAC 6-5 are not federally enforceable. However, as indicated in Response 7, 326 IAC 6-5 is not applicable to this source. Condition C.6 is revised as shown in Response 7.

(b) Indiana has interim approval from the Environmental Protection Agency (EPA) for 326 IAC 2-7, which expires on December 1, 2001. Therefore, all requirements of 326 IAC 2-7, Part 70, are federally enforceable. There are no changes to Conditions C.7, C.12, C.13, C.17, C.18, C.19, C.20, C.21 and C.22 as a result of this comment.

(c) 326 IAC 14-10 and 326 IAC 18 are not part of the Indiana SIP because IDEM, OAQ, has delegated authority from a different area of EPA. It is part of IDEMs authority to have an asbestos program to comply with 40 CFR 61, Subpart M. Therefore, there are no changes to Condition C.9 as a result of this comment.

(d) 326 IAC 3-6 was approved by EPA on November 22, 1999. Therefore, 326 IAC 3-6 is federally enforceable and there are no changes Condition C.10 as a result of this comment.

(e) 326 IAC 2-1.1-11 is not approved by EPA, but the same language was approved in 326 IAC 2-1 on October 7, 1994. Therefore, Conditions C.11 and C.22 are federally enforceable and there are no changes to these conditions as a result of this comment.

(f) 326 IAC 1-5 was approved by EPA on May 31, 1972. Therefore, 326 IAC 1-5-2 and 1-5-3 are federally enforceable and there are no changes to Conditions C.16 as a result of this comment.

(g) 326 IAC 22-1 has not been approved by EPA. However, this rule incorporates the federal

requirements by reference. Therefore, complying with 326 IAC 22-1 is a federal requirement and there are no changes to Condition C.23 as a result of this comment.

Comment 7:

C.6: FIP has an updated roof cleaning plan which should replace the 1987 plan. In addition, the facility does not generate fugitive particulate matter as defined in 326 IAC 6-5-2 as all particulate matter emissions from the facility are discharged via stacks. Therefore, the requirements of 326 IAC 6-5 do not apply and FIP requests that this section be removed from the Title V Permit.

Response 7:

IDEM, OAQ, agrees that 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations) is not applicable because all particulate emissions are discharged via stacks. However, pursuant to OP 29-01-94-0150, issued on January 30, 1990, a roof cleaning plan was required. This plan was developed as a result of a complaint IDEM received in October 1987. In order to clarify the reason for this requirement and allow for changes in the plan, Condition C.6 is revised as follows:

C.6 ~~Fugitive~~ Particulate Matter Emission**s** ~~Limitations [326 IAC 6-5]~~

Pursuant to **OP 29-01-94-0150, issued on January 30, 1990,** ~~326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive~~ particulate matter emissions shall be controlled according to the **roof cleaning** plan submitted on November 3, 1987 **or a roof cleaning plan approved by IDEM, OAQ**. The plan does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). ~~The plan consists of roof cleaning plan.~~ A log of roof cleaning shall be kept and be available for inspection upon request.

Comment 8:

C.10: FIP requests that the section be rewritten as follows. "All testing required by this permit or applicable regulations…".

Response 8:

IDEM, OAQ, may require testing in the future, and those tests will need to comply with Condition C.10. However, this condition only applies to testing done to determine compliance with environmental rules for air emissions. Therefore, Condition C.10 is revised as follows:

C.10 Performance Testing [326 IAC 3-6]

(a) All testing **used to determine compliance with environmental rules for air emissions** shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326

IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date **of all tests used to determine compliance with environmental rules for air emissions** at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports **for tests used to determine compliance with environmental rules for air emissions** must be received by IDEM, OAQ, within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Comment 9:

C.15: There are no applicable requirements regarding pressure gauge specifications and FIP requests that this section be removed from the Title V Permit.

Response 9:

Pressure gauges are required to perform the parametric monitoring required by Conditions D.2.5 and D.7.5. Therefore, there are no changes to the permit as a result of this comment.

Comment 10:

C.18(a)(5): A requirement for Compliance Response Plans (CRPs) is not specifically identified in 326 IAC 2-7-5 and 2-7-6 and FIP requests that this section and all references to CRPs be removed from the Title V permit.

Response 10:

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past few years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each Permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each Permittee's Annual Compliance Certification. Each Permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." The Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. Response maintenance included inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the Permittee would take in the event an inspection indicated an "out of specification situation", and set the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for situa-

tions that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the equipment to prevent an exceedance of an emission limit or violation of other permit requirements.

After issuing the first draft Title V permits in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was to remove the corrective action and related schedule requirements from the PMP requirement and place them into some other requirement. This suggestion was based, in some part, on the desire that a Permittee's maintenance staff handle the routine maintenance of the equipment, and a Permittee's environmental compliance and engineering staff handle the compliance monitoring.

IDEM agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps."

The CRP response steps and schedule requirements are examples of documenting procedures developed from good business practices and the prevention of environmental problems. Permittees already have maintenance schedules and trouble shooting guides that specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the trouble shooting guide and the Permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

326 IAC 2-7-5(3)(c)(i) sets out the requirement to report any required monitoring at least every six (6) months. This report must include an identification of all permit deviations. 326 IAC 2-7-5(3)(c)(ii) sets out a separate requirement for reporting those deviations, including the information required in each deviation report.

Comment 11:

C.19: Requirements for responses to stack test non-compliance issues are not specifically identified in 326 IAC 2-7-5 and 326 IAC 2-7-6 and FIP requests that this section be removed from the Title V permit.

Response 11:

OAQ has authority under 326 IAC 2-7-6(6) to require this condition. OAQ also has authority under 326 IAC 2-7-5.

Section D Facility Operating Conditions

Comment 12:

Several of the Indiana regulations referenced in this section are not part of Indiana's approved SIP and are therefore not federally enforceable. The following sections and associated regulations are not federally enforceable which should be stated as such in the Title V Permit.

D.1.2 326 IAC 7-1.1-2

D.1.3 326 IAC 2-7-5

D.1.4 326 IAC 3-7-4

D.1.5 326 IAC 2-7-5 and 326 IAC 2-7-6
D.1.6 326 IAC 2-7-5
D.2.2 326 IAC 2-7-5
D.2.4 326 IAC 2-7-5 and 326 IAC 2-7-6
D.2.5 326 IAC 2-7-5 and 326 IAC 2-7-6
D.2.6 326 IAC 2-7-5 and 326 IAC 2-7-6
D.2.7 326 IAC 2-7-5 and 326 IAC 2-7-6
D.2.8 326 IAC 2-7-5
D.4.3 326 IAC 2-7-5
D.4.5 326 IAC 2-7-5 and 326 IAC 2-7-6
D.4.6 326 IAC 2-7-5
D.6.2 326 IAC 7-1.1-11 and 326 IAC 12-1
D.6.3 326 IAC 2-7-5
D.6.4 326 IAC 2-1.1-11 and 326 IAC 2-7-6
D.6.5 326 IAC 2-7-5 and 326 IAC 2-7-6
D.6.6 326 IAC 2-7-5
D.7.2 326 IAC 2-7-5
D.7.4 326 IAC 2-7-5 and 326 IAC 2-7-6
D.7.5 326 IAC 2-7-5 and 326 IAC 2-7-6
D.7.7 326 IAC 2-7-5 and 326 IAC 2-7-6
D.7.6 326 IAC 2-7-5 and 326 IAC 2-7-6
D.7.8 326 IAC 2-7-5

Response 12:

(a) Indiana has interim approval from the Environmental Protection Agency (EPA) for 326 IAC 2-7, which expires on December 1, 2001. Therefore, all requirements of 326 IAC 2-7, Part 70, are federally enforceable. There are no changes to Conditions D.1.3, D.1.5, D.1.6, D.2.2, D.2.4, D.2.5, D.2.6, D.2.7, D.2.8, D.4.3, D.4.5, D.4.6, D.6.3, D.6.4, D.6.5, D.6.6, D.7.2, D.7.4, D.7.5, D.7.6, D.7.7, and D.7.8 as a result of this comment.

(b) 326 IAC 7-1.1-2 has not been approved by EPA at this time. However, the same language was approved in 326 IAC 7-1 on January 19, 1988. Therefore, the requirements of 326 IAC 7-1.1-2 are federally enforceable and there are no changes to D.1.2 as a result of this comment.

(c) 326 IAC 3-7-4 was approved by EPA on March 1, 1998. Therefore, the requirements of this rule are federally enforceable, and there are no changes to Condition D.1.4 as a result of this comment.

(d) 326 IAC 12-1 was approved by EPA on July 16, 1984. Therefore, the requirements of 326 IAC 12-1 are federally enforceable, and there are no changes to Condition D.6.1 as a result of this comment.

Comment 13:

D.1.4: This requirement applies to the use of No. 2 Fuel Oil and section (a)(1) should be rewritten as "Providing vendor analysis of No. 2 Fuel Oil delivered…".

Response 13:

Condition D.1.4 is revised as follows:

D.1.4 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million British thermal units heat input by:

(1) Providing vendor analysis of **No. 2** fuel **oil** delivered, if accompanied by a certification;

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

Comment 14:

D.1.5: Specific compliance monitoring actions are not identified in 326 IAC 2-7-6 and 326 IAC 2-7-5. In addition, the compliance assurance monitoring (CAM) requirements of 40 CFR 64.3(a) (1) indicate "The owner or operator shall design the monitoring to obtain data for one or more indicators of emission control performance ...". FIP requests that this section be removed from the Title V Permit. Compliance will be monitored as set forth in the Compliance Monitoring Plan (CMP) prepared by FIP as required in Section C.18.

Response 14:

IDEM, OAQ, has the authority under 326 IAC 2-7-5(3) and 326 IAC 2-7-6(1) to require compliance monitoring as necessary to evaluate continuous compliance with the applicable requirements. IDEM, OAQ, has determined that the use of visible emissions notations is a dependable method of monitoring compliance with PM emission limitations for boilers when operating on fuel oil.

Comment 15:

D.1.5(a): If these requirements are not deferred to the CMP required in Section C.18, FIP requests

that the requirement for once per shift inspections be removed from the Title V Permit. FIP believes that once per shift inspections are excessive and daily inspections, as provided for in Sections D.2, D.4 and D.7, are adequate.

Response 15:

The reason for compliance monitoring is to allow the Permittee to identify any abnormalities before they lead to non-compliance. Therefore, a monitoring frequency of once per shift during normal daylight operations is required. Monitoring once per day is not frequent enough to ensure that abnormalities with boiler emissions, when operating on No. 2 fuel oil, are found before they result in a problem.

Comment 16:

D.1.5(e): A requirement for CRPs is not specifically identified in 326 IAC 2-7-5 and 2-7-6 and FIP requests that this section and all references to CRPs be removed from the Title V permit.

Response 16:

See Response 10.

Comment 17:

D.1.6(b): If these requirements are not deferred to the CMP required in Section C.18, FIP requests that the requirement for once per shift inspections be removed from the Title V Permit. FIP believes that once per shift inspections are excessive and daily inspections, as provided for in Sections D.2, D.4 and D.7, are adequate.

Response 17:

See Response 15.

Comment 18:

D.1.7: A Semi-Annual Natural Gas-Fired Boiler Certification is not specifically required in the IAC or the Clean Air Act and FIP requests that this section be removed from the Title V Permit.

Response 18:

IDEM, OAQ, has the authority under 326 IAC 2-7-5(3) and 326 IAC 2-7-6(1) to require record keeping and reporting requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements. In order to evaluate compliance with 326 IAC 7-1.1-2, Sulfur Dioxide Emission Limitations, IDEM, OAQ, will need a certification of the times when natural gas and when No. 2 fuel oil were used in the boiler. Also, visible emissions notations are only required when operating on fuel oil. Removing the Semi-Annual Natural Gas-Fired Boiler Certification requirement would result in visible emissions notation requirements at all times because IDEM, OAM, would not have the information necessary to determine when fuel oil was used. Therefore, there will be no changes to the permit as a result of this comment.

Comment 19:

D.2.4-D.2.7: Specific compliance monitoring actions are not identified in 326 IAC 2-7-6(1) and 326 2-7-5(1). In addition, the CAM requirements of 40 CFR 64.3(a)(1) indicate “The owner or operator

shall design the monitoring to obtain data for one or more indicators of emission control performance ...". FIP requests that this section be removed from the Title V Permit. Compliance will be monitored as set forth in the CMP prepared by FIP as required in Section C.18.

Response 19:

IDEM, OAQ, has the authority under 326 IAC 2-7-5(3) and 326 IAC 2-7-6(1) to require compliance monitoring as necessary to evaluate continuous compliance with the applicable requirements. IDEM, OAQ, has determined that the use of visible emissions notations, parametric monitoring, and baghouse inspections are dependable methods of monitoring compliance with PM emission limitations for the mixing lines. The baghouses controlling the mixing lines must operate properly so that the source remains a minor source pursuant to 326 IAC 2-2, Prevention of Significant Deterioration (PSD). To clarify this, Condition D.2.1 is revised as follows:

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]**[326 IAC 2-2]**

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the one (1) mixer at the Werner-Pfleiderer mixing line shall not exceed 4.76 pounds per hour when operating at a process weight rate of 2,500 pounds per hour.

(b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the one (1) drop mix mill at the Werner-Pfleiderer mixing line shall not exceed 4.76 pounds per hour when operating at a process weight rate of 2,500 pounds per hour.

(c) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the one (1) mixer at the Banbury mixing line shall not exceed 4.76 pounds per hour when operating at a process weight rate of 2,500 pounds per hour.

(d) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the one (1) drop mix mill at the Banbury mixing line shall not exceed 4.76 pounds per hour when operating at a process weight rate of 2,500 pounds per hour.

These pound per hour limitations were calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour.

(e) Compliance with these limits will make the total source potential to emit of PM less than 250 tons per year. Therefore, this source is a minor source pursuant to 326 IAC 2-2, PSD.

Comment 20:

D.2.5: FIP requests that all references to the CRP and the Pressure Gauge Specifications be removed from the permit (see comments to Section C.18(a)(5) and Section C.15). In addition, the pressure drop range for each baghouse will be established by historical data and specified in the CMP.

Response 20:

See Response 10. Pressure Gauge Specifications are required so that the pressure gauges are

operating properly when being used in parametric monitoring. The pressure drop is specified in the permit to assure that the pressure drop is maintained within a range that results in a control efficiency that assures compliance with 326 IAC 6-3, Process Operations, and makes 326 IAC 2-2, Prevention of Significant Deterioration, not applicable. If requested by Firestone Industrial Products Company and approved by OAQ, the pressure drop can be revised to a more appropriate range in the future.

Comment 21:

D.2.7: FIP requests that all references to the CRP be removed from the permit (see comment to Section C.18(a)(5).

Response 21:

See Response 10.

Comment 22:

D.2.8: FIP believes the requirements of the section to be excessively descriptive and request modifications in accordance with the above comments to Sections D.2.4 through D.2.7.

Response 22:

Condition D.2.8 has been revised as follows:

D.2.8 Record Keeping Requirements

(a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhaust.

(b) To document compliance with Condition D.2.5, the Permittee shall maintain the following:

(1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

~~(2) Documentation of all response steps implemented, per event.~~

~~(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.~~

~~(4) Quality Assurance/Quality Control (QA/QC) procedures.~~

~~(5) Operator standard operating procedures (SOP).~~

~~(6) Manufacturer's specifications or its equivalent.~~

~~(7) Equipment "troubleshooting" contingency plan.~~

~~(8)~~**(2)** Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 23:

D.3.1(b): FIP does not coat any items identified in 326 IAC 8-2-9(a) and is therefore not subject to this regulation, regardless of potential VOC emissions. FIP requests that this section be removed from the Title V Permit.

Response 23:

Pursuant to 326 IAC 8-2-9(c), commencing July 1, 1991, the application of adhesives to metal parts is subject to the requirements of 326 IAC 8-2-9. Therefore, the processes listed in Section D.3 can be subject to 326 IAC 8-2-9 if the facilities are subject to the requirements of 326 IAC 8-2. Therefore, as stated in Condition D.3.1(b), any change or modification that increases the potential to emit VOC from the manual cement dip operations, identified as emission unit 010, or from the automatic cement dip operations, identified as emission unit 011, to twenty-five (25) tons per year or more may cause the facility to become subject to 326 IAC 8-2-9 and shall require prior approval.

Comment 24:

D.4(g): The large cement application booth is equipped with brushes, not bushes.

Response 24:

This item has been corrected. See Response 1.

Comment 25:

D.4.1: The large spray booth does not generate particulate matter and should be removed from the particulate matter limitation statement.

Response 25:

The wording spray booth is misleading since it implies that something is being sprayed into the air, thus potentially creating PM emissions. However, as indicated in the letter from Firestone Industrial Products Company received on October 6, 2000, there are no means of spray application used at this booth. Therefore, the booth is referred to as a "large cement application booth" in the permit, as opposed to a "large cement spray booth." Since there is no spray application operations and no potential for overspray or PM emissions from this booth, Condition D.4.1 is revised as follows:

D.4.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the five (5) small spray booths, identified as emission units 012 through 016, ~~and the one (1) large cement application booth, identified as emission unit 017,~~ shall be limited by the following:

Interpolation ~~and extrapolation~~ of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour

Comment 26:

D.4.2: FIP does not coat any items identified in 326 IAC 8-2-9(a) and is therefore not subject to this regulation, regardless of potential VOC emissions. FIP requests that this section be removed from the Title V Permit.

Response 26:

See Response 23.

Comment 27:

D.4.3: The large spray booth does not generate particulate matter and is not equipped with a control device, therefore is not required to have a preventative maintenance plan (PMP). FIP requests that this section be modified to specify PMPs are required only for the small spray booths.

Response 27:

If lack of proper maintenance could cause or contribute to a violation of any limitation on emissions or potential to emit, then a Preventive Maintenance Plan (PMP) will be required even if there is no control device. However, since there are no rules applicable to the one (1) large cement application booth, the requirement for PMP is removed, and Condition D.4.3 is revised as follows:

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for ~~these facilities~~ **the five (5) small spray booths** and all control devices.

Comment 28:

D.4.5: Specific compliance monitoring actions are not identified in 326 IAC 2-7-6(1) and 326 2-7-5(1). In addition, the CAM requirements of 40 CFR 64.3(a)(1) indicate “The owner or operator shall design the monitoring to obtain data for one or more indicators of emission control performance ...”. FIP requests that this section be removed from the Title V Permit. Compliance will be monitored as set forth in the CMP prepared by FIP as required in Section C.18. FIP also requests that all references to the CRP be removed from the permit (see comments to Section C.18(a)(5)).

Response 28:

IDEM, OAQ, has the authority under 326 IAC 2-7-5(3) and 326 IAC 2-7-6(1) to require compliance monitoring as necessary to evaluate continuous compliance with the applicable requirements. IDEM, OAQ, has determined that the use of the daily dry filter inspection, weekly observations of overspray, and monthly particulate and overspray inspections are dependable methods of monitoring compliance with PM emission limitations for surface coating operations, which use spray application methods and dry filters. Therefore, there are no changes to the permit as a result of this comment.

Comment 29:

D.4.5(b): This requirement is a duplication of the inspection requirements identified in Section D.4.5(a) and should be removed from the Title V Permit.

Response 29:

Condition D.4.5(b) requires monthly inspections of the coating emissions from the stack and the presence of overspray on the rooftops and nearby ground. Condition D.4.5(a) requires daily inspections to verify the placement, integrity and particle loading of the dry filters and weekly observations of the overspray from the surface coating spray booth stacks. The monthly inspections require an inspection of the overspray where it would or could settle, whereas the weekly inspections simply require a visual inspection of the emissions from the stacks to which the spray booths exhaust. These requirements are different and there will be no changes to the permit as a result of this comment.

Comment 30:

D.6.4: This requirement applies to the use of No. 2 Fuel Oil and section (a)(1) should be rewritten as "Providing vendor analysis of No. 2 Fuel Oil delivered…".

Response 30:

Condition D.6.4 is revised as follows:

D.6.4 Sulfur Dioxide Emissions and Sulfur Content

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options:

(a) Providing vendor analysis of **No. 2** fuel **oil** delivered, if accompanied by a certification; or

(b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

Comment 31:

D.6.5: Specific compliance monitoring actions are not identified in 326 IAC 2-7-6(1) and 326 2-7-5(1). In addition, the CAM requirements of 40 CFR 64.3(a)(1) indicate "The owner or operator shall design the monitoring to obtain data for one or more indicators of emission control performance ...". FIP requests that this section be removed from the Title V Permit. Compliance will be monitored as set forth in the CMP prepared by FIP as required in Section C.18.

Response 31:

See Response 14.

Comment 32:

D.6.5(a): If these requirements are not deferred to the CMP required in Section C.18, FIP requests that the requirement for once per shift inspections be removed from the Title V Permit. FIP believes that once per shift inspections are excessive and daily inspections, as provided for in Sections D.2,

D.4 and D.7, are adequate.

Response 32:

See Response 15.

Comment 33:

D.6.5(e): A requirement for CRPs is not specifically identified in 326 IAC 2-7-5 and 2-7-6 and FIP requests that this section and all references to CRPs be removed from the Title V permit.

Response 33:

See Response 10 for IDEM's response to the CRP comment. Pressure Gauge Specifications are required because a pressure drop reading is required in Condition D.6.5.

Comment 34:

D.6.6(b): If these requirements are not deferred to the CMP required in Section C.18, FIP requests that the requirement for once per shift inspections be removed from the Title V Permit. FIP believes that once per shift inspections are excessive and daily inspections, as provided for in Sections D.2, D.4 and D.7, are adequate.

Response 34:

See Response 15.

Comment 35:

D.6.7: A Semi-Annual Natural Gas-Fired Boiler Certification is not specifically required in the IAC or the Clean Air Act and FIP requests that this section be removed from the Title V Permit.

Response 35:

See Response 18.

Comment 36:

D.7.4-D.7.7: Specific compliance monitoring actions are not identified in 326 IAC 2-7-6(1) and 326 2-7-5(1). In addition, the CAM requirements of 40 CFR 64.3(a)(1) indicate "The owner or operator shall design the monitoring to obtain data for one or more indicators of emission control performance ...". FIP requests that this section be removed from the Title V Permit. Compliance will be monitored as set forth in the CMP prepared by FIP as required in Section C.18.

Response 36:

See Response 14.

Comment 37:

D.7.5: FIP requests that all references to the CRP and the Pressure Gauge Specifications be removed from the permit (see comments to Section C.18(a)(5) and Section C.15). In addition, the pressure drop range for each baghouse will be established by historical data and specified in the

CMP.

Response 37:

See Response 10 for IDEM's response to the CRP comment. Pressure Gauge Specifications are required because a pressure drop reading is required in Condition D.7.5.

Comment 38:

D.7.7: FIP requests that all references to the CRP be removed from the permit (see comment to Section C.18(a)(5).

Response 38:

See Response 10.

Comment 39:

D.7.8: FIP believes the requirements of the section to be excessively descriptive and request modifications in accordance with the above comments to Sections D.7.4 through D.7.7.

Response 39:

Condition D.7.8 is revised as follows:

D.7.8 Record Keeping Requirements

(a) To document compliance with Condition D.7.4, the Permittee shall maintain records of daily visible emission notations of the rubber compounding stack exhaust.

(b) To document compliance with Condition D.7.5, the Permittee shall maintain the following:

(1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

~~(2) Documentation of all response steps implemented, per event.~~

~~(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.~~

~~(4) Quality Assurance/Quality Control (QA/QC) procedures.~~

~~(5) Operator standard operating procedures (SOP).~~

~~(6) Manufacturer's specifications or its equivalent.~~

~~(7) Equipment "troubleshooting" contingency plan.~~

~~(8)~~**(2)** Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.7.6, the Permittee shall maintain records of the results of the inspections required under Condition D.7.6 and the dates the vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 40:

D.8: As stated in the comments to MES dated October 2, 2000, the insignificant activities identified above [A.3(g-s)] should be included in this section.

Response 40:

See Response 3. These insignificant activities are not added to the facility description box in Section D.8 because there are no applicable requirements.

General

Comment 41:

The air stripping towers and swabbing operation referenced in Section A.2 are not listed in Section D, Facility Operation Conditions. FIP requests that these units and their applicable operating conditions be added to section D of the Title V Permit.

Response 41:

The air stripping tower and the swabbing operations listed in Section A.2 are not listed in a Section D because there are no applicable rules. For completeness, these facilities have been added to the facility description box in Section D.7 as follows:

Facility Description [326 IAC 2-7-5(15)]

(j) One (1) rubber compounding operation, identified as emission unit 003, consisting of weighing and conveying raw materials, equipped with a baghouse and exhausted to M-15, constructed in the 1980s, estimated capacity: 1,530 pounds of rubber per hour, 770 pounds of carbon black per hour, and 200 pounds of pigments per hour.

(k) Two (2) air stripping towers, identified as emission units 008 and 009, exhausted to AS-1 and AS-2, constructed in 1992, capacity: 800 gallons per minute, each.

(l) One (1) swabbing operation, identified as emission unit 081, exhausted to P-1, constructed prior to 1980, capacity: 11,680 gallons of solvent and cement per year.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Technical Support Document (TSD)

Comment 42:

Unpermitted Emission Units: The two air stripping towers identified in this section were registered and should be moved to the Permitted Emission Units section.

Response 42:

The two (2) air stripping towers were registered to operate at a capacity of 800 gallons per minute, total. The capacity of the two (2) air stripping towers is 800 gallons per minute, each.

Comment 43:

Enforcement: The two air stripping towers identified in the Unpermitted Emission Units section were registered units and should not be subject to any enforcement actions.

Response 43:

See Response 42.

Comment 44:

Federal Rule Applicability: The No. 2 fuel oil storage tank identified in section (c) should be identified as unit 112, not unit 002.

Response 44:

IDEM, OAQ, agrees that the No. 2 fuel oil storage tank should have been identified as unit 112, not unit 002. The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 45:

State Rule Applicability:

326 IAC 6-5: The facility does not generate fugitive particulate matter as defined in 326 IAC 6-5-2 as all particulate matter emissions from the facility are discharged via stacks. Therefore, the requirements of 326 IAC 6-5 do not apply and FIP requests that this section be removed from the TSD.

326 IAC 6-3-2: The large spray booth does not emit particulate matter and should be removed from the particulate matter limitations of this section.

326 IAC 8-2-9: FIP does not coat any items identified in 326 IAC 8-2-9(a) and the manual cement dip, automatic cement dip, small spray booths, and large spray booth are therefore not subject to this regulation, regardless of potential VOC emissions. FIP requests that this section be removed from the Title V Permit.

Response 45:

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. These comments are addressed in Responses 7, 23 and 25.

Comment 46:

Compliance Requirements: Specific compliance monitoring actions are not identified in 326 IAC 2-7-6(1) and 326 2-7-5(1). In addition, the CAM requirements of 40 CFR 64.3(a)(1) indicate “The owner or operator shall design the monitoring to obtain data for one or more indicators of emission control performance ...”. FIP requests that this section be removed from the TSD. Compliance will be monitored as set forth in the CMP prepared by FIP as required in Section C.18 of the Title V Air Permit. These sections should be removed or modified as described in the comments to the specific sections of the Title V Permit. Finally, FIP can accept only those compliance determination requirements specifically identified in state and federal regulations. IDEM should specify such requirements in Section D of the Title V Permit and remove all references to requirements "more or less found" in state and federal regulations.

Response 46:

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. These comments are addressed in Responses 14, 19, 28 and 36.

Appendix A: Emissions Calculations

Comment 47:

Natural Gas Combustion Only: The header should state One (1) 20 MMBtu/hr boiler and One (1) 31.38 MMBtu/hr boiler instead of Two (2) 20 MMBtu/hr boilers.

Specific emission factors were provided by the manufacturer for boiler 001A as indicated in construction permit CP 057-9551-00006 and should be used instead of the AP-42 factors.

PM	0.01 lbs/MMBTU
PM_{10}	0.01 lbs/MMBTU
SO_2	0.001 lbs/MMBTU
NO_X	0.07 lbs/MMBTU
VOC	0.015 lbs/MMBTU
CO	0.15 lbs/MMBTU

Response 47:

The AP-42 emission factors are used for all boilers within Indiana unless a stack test has been done on the boiler or on a boiler determined to be equivalent. The headers on these spreadsheets (Pages 1 and 2 of 9 of TSD Appendix A) are incorrect. They should read, “Two (2) Boilers.” The

OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 48:

VOC, Particulate and HAP Emissions from Surface Coating Operations:

Surface coating operations are a small part of the manufacturing process at FIP and are not required for all products produced at this facility. Although each unit has a maximum capacity, emissions based on these capacities for 8,760 hours per year is not a true representation of FIP's PTE. Since the coating operations are limited by the amount of rubber parts produced which will use the coated products, the PTE for the coating operations was determined by multiplying the actual emissions for 1999 by the ratio of maximum rubber throughput versus 1999 actual rubber throughput. This method of calculating the PTE was agreed upon by the IDEM and Baker Environmental, a representative of FIP, during completion of the Title V Application. This estimated material usage has been manipulated in the TSD calculations to create a corresponding maximum capacity and quantity of materials used in gallons per unit which when combined with the 8,760 hours per year yields a PTE similar to FIP's calculations. Although the PTEs are similar, these maximum capacities and material usages have no real relation to the facility and may cause confusion with future permitting and compliance determinations. Therefore, FIP requests that the attached calculations be substituted in the TSD.

Response 48:

The gallons per unit and the units per hour in pages 6 and 7 of 9 of TSD Appendix A represent the gallons of coating used per pound of rubber product produced and the pounds of rubber products produced per hour. This method of calculation is equivalent to the calculations provided with this comment which use the actual material usage and actual rubber produced to compute a gallons of coating per pound of rubber produced and scale that up based on the maximum production rate.

Upon further review, the OAQ has decided to make the following changes to the Part 70 Operating Permit (The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded.**):

Change 1:

To clarify the capacity of the units, items (d), (e), (f), and (g) of Section A.2, along with (d) and (e) in the facility description box in Section D.3 and (f) and (g) in the facility description box in Section D.4, have been revised as follows:

(d) One (1) manual cement dip operations consisting of three (3) tanks, identified as emission unit 010, constructed in 1980, for applying adhesive to metal parts, exhausted to three (3) stacks, all identified as S-31, capacity: 777 ~~units~~ **metal parts** per hour.

(e) One (1) automatic cement dip operation consisting of two (2) tanks, identified as emission unit 011, for applying adhesive to metal parts, exhausted to two (2) stacks, both identified as S-27, constructed in 1985, capacity: 1,995 ~~units~~ **metal parts** per hour.

(f) Five (5) small spray booths, identified as emission units 012 through 016, exhausted to R-24A, R-24B, R-25, S-24 and S-25 respectively, constructed in 1980, for applying adhesive

to metal parts, equipped with air atomizer spray guns and dry filters for overspray control, capacity: 88 ~~units~~ **metal parts** per hour, each.

(g) One (1) large cement application booth, identified as emission unit 017, exhausted to T-30, constructed in 1980, for applying adhesive to metal parts, equipped with brushes for hand application, capacity: 88 ~~units~~ **metal parts** per hour.

Change 2:

The name of IDEM's "Office of Air Management" was changed to "Office of Air Quality" on January 1, 2001. All references to "Office of Air Management" in the permit have been changed to "Office of Air Quality" and all references to "OAM" have been changed to "OAQ."

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Two (2) 20 MMBtu/hr boilers

Company Name: Firestone Industrial Products Company
Address City IN Zip: 1700 Firestone Blvd., Noblesville, Indiana 46060
Part 70: T 057-5997
Plt ID: 057-00006
Reviewer: CarrieAnn Ortolani
Date: May 31, 1996

002

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
20.0	175.20

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.166	0.666	0.053	8.76	0.482	7.36

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

001A

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
31.38	274.89

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.261	1.04	0.082	13.7	0.756	11.5

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 4 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name: Firestone Industrial Products Company
Address City IN Zip: 1700 Firestone Blvd., Noblesville, Indiana 46060
Part 70: T 057-5997
Plt ID: 057-00006
Reviewer: CarrieAnn Ortolani
Date: May 31, 1996

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.73E-04	2.70E-04	1.69E-02	4.05E-01	7.65E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.13E-04	2.48E-04	3.15E-04	8.55E-05	4.73E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
Two (2) Boilers

Company Name: Firestone Industrial Products Company
Address City IN Zip: 1700 Firestone Blvd., Noblesville, Indiana 46060
Part 70: T 057-5997
Plt ID: 057-00006
Reviewer: CarrieAnn Ortolani
Date: May 31, 1996

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur
20.0	1251	0.5

	Pollutant				
	PM*	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	2.0	71 *(142.0S)*	20.0	0.34	5.0
Potential Emission in tons/yr	1.25	44.4	12.5	0.213	3.13

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur
31.38	1963	0.5

	Pollutant				
	PM*	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	2.0	71 *(142.0S)*	20.0	0.34	5.0
Potential Emission in tons/yr	1.96	69.7	19.6	0.334	4.91

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 4 for HAPs emission calculations.

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
HAPs Emissions

Company Name: Firestone Industrial Products Company
Address City IN Zip: 1700 Firestone Blvd., Noblesville, Indiana 46060
Part 70: T 057-5997
Plt ID: 057-00006
Reviewer: CarrieAnn Ortolani
Date: May 31, 1996

HAPs - Metals

	Arsenic	Beryllium	Cadmium	Chromium	Lead
Emission Factor in lb/mmBtu	4.0E-06	3.0E-06	3.0E-06	3.0E-06	9.0E-06
Potential Emission in tons/yr	9.00E-04	6.75E-04	6.75E-04	6.75E-04	2.03E-03

HAPs - Metals (continued)

	Mercury	Manganese	Nickel	Selenium
Emission Factor in lb/mmBtu	3.0E-06	6.0E-06	3.0E-06	1.5E-05
Potential Emission in tons/yr	6.75E-04	1.35E-03	6.75E-04	3.38E-03

Methodology

No data was available in AP-42 for organic HAPs.
Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

Appendix A: Emission Calculations
Process Operations

Company Name: Firestone Industrial Products Company
Address City IN Zip: 1700 Firestone Blvd., Noblesville, Indiana 46060
Part 70: T 057-5997
Plt ID: 057-00006
Reviewer: CarrieAnn Ortolani
Date: May 31, 1996

Emission Unit	Unit ID	Stack	Flow Rate (acfm)	Outlet Grain Loading (gr/acfm)	Controlled Emission Rate (lbs/hr)	Controlled Emission Rate (tons/yr)	Control Efficiency	Potential Emissions (lbs/hr)	Potential Emissions (tons/yr)	Process Weight Rate (lbs/hr)	Allowable Emissions (lbs/hr)
One (1) mixer (004)	J16	J16	12000	0.02	2.06	9.01	90.0%	20.6	90.1	6294	8.84
One (1) drop mix mill (004)	J10	J10	12000	0.02	2.06	9.01	90.0%	20.6	90.1	6294	8.84
One (1) mixer (005)	H16	H16	12000	0.02	2.06	9.01	90.0%	20.6	90.1	6294	8.84
Rubber compounding (003)	M-15	M-15	3600	0.02	0.617	2.70	90.0%	6.17	27.0	6294	8.84
					6.79	29.7		67.9	297		

Methodology

Controlled Emissions (lbs/hr) = gr/acfm x acfm x 60 minutes/hr / 7000 gr/lb
Uncontrolled Emissions (lbs/hr) = Controlled Emissions (lbs/hr) / (1 - Control Efficiency)
Emissions (tons/yr) = Emissions (lbs/hr) * 8760 hrs/yr / 2000 lbs/ton
Allowable Emissions (lbs/hr) = 4.10 x (Process weight (lbs/hr) / 2000 lbs/ton)^0.67 [326 IAC 6-3-2]

Other Emissions from Rubber Parts Manufacturing

	Rubber Throughput (lbs/hr)	VOC Emission Factor (lbs/lb rubber)	VOC (lbs/hr)	VOC (tons/yr)	Total HAPs Emission Factor (lbs/lb rubber)	HAPs (lbs/hr)	HAPs (tons/yr)	PM Emission Factor (lbs/lb rubber)	PM (lbs/hr)	PM (tons/yr)
Press Curing (029 - 080 and 130-139)	1600	6.68E-03	10.69	46.8	1.36E-03	2.18	9.53	N/A	N/A	N/A
Vulcanizers (082 - 096 and 148)	900	6.15E-03	5.54	24.2	6.04E-03	5.44	23.8	N/A	N/A	N/A
Mixing and Milling (mixer 004)	2500	4.44E-04	1.11	4.86	1.40E-04	0.350	1.53	See above	See above	See above
Mixing and Milling (drop mix mill 004)	2500	4.44E-04	1.11	4.86	1.40E-04	0.350	1.53	See above	See above	See above
Mixing and Milling (mixer 005)	2500	4.44E-04	1.11	4.86	1.40E-04	0.350	1.53	See above	See above	See above
Mixing and Milling (drop mix mill 005)	2500	4.44E-04	1.11	4.86	1.40E-04	0.350	1.53	9.25E-04	2.31	10.1
Milling only (slab mill 004)	2500	6.48E-04	1.62	7.10	7.28E-05	0.182	0.797	N/A	N/A	N/A
Milling only (slab mill 005)	2500	6.48E-04	1.62	7.10	7.28E-05	0.182	0.797	N/A	N/A	N/A
Insignificant Activities										
Calendering	2700	1.60E-04	0.432	1.89	7.52E-05	0.203	0.889	1.12E-07	3.02E-04	1.32E-03
Extrusion	900	1.60E-04	0.144	0.631	7.52E-05	0.068	0.296	1.12E-07	1.01E-04	4.42E-04
Repair Press Curing (141-147)	80	6.68E-03	0.534	2.34	1.36E-03	0.109	0.477	N/A	N/A	N/A
Mixing and Milling (Rubber mill mixer 007)	118	4.44E-04	0.052	0.229	1.40E-04	0.017	0.072	9.25E-04	0.109	0.478
Milling only (5 mills at extrusion line)	1800	6.48E-04	1.17	5.11	7.28E-05	0.131	0.574	N/A	N/A	N/A
Milling only (4 mills at calendering)	5400	6.48E-04	3.50	15.3	7.28E-05	0.393	1.72	N/A	N/A	N/A
		Totals:	**29.7**	**130**		**10.3**	**45.1**		**2.42**	**10.6**

Emission Factors from Tables 4.12-6, 4.12-8 and 4.12-4 of AP-42 draft Section 4.12
Emission factors are for the worst case compound for each pollutant.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Firestone Industrial Products Company
Address City IN Zip: 1700 Firestone Blvd., Noblesville, Indiana 46060
Part 70: T 057-5997
Plt ID: 057-00006
Reviewer: CarrieAnn Ortolani
Date: May 31, 199

Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Manual Cement Dip Unit (010)																
Chemlok 205	7.81	75.70%	0.0%	75.70%	0.0%	13.10%	1.45E-06	5000.000	5.91	5.91	0.04	1.03	0.19	0.00	45.13	100%
Chemlock 252X	7.99	77.00%	0.0%	77.00%	0.0%	13.70%	1.62E-06	5000.000	6.15	6.15	0.05	1.20	0.22	0.00	44.91	100%
Xylene	7.22	100.00%	0.0%	100.00%	0.0%	0.00%	3.38E-06	5000.000	7.22	7.22	0.12	2.93	0.53	0.00	n/a	100%
MEK	6.70	100.00%	0.0%	100.00%	0.0%	0.00%	1.19E-05	5000.000	6.70	6.70	0.40	9.57	1.75	0.00	n/a	100%
Automatic Cement Dip Unit (011)																
Chemlok 205	7.81	75.70%	0.0%	75.70%	0.0%	13.10%	3.73E-06	5000.000	5.91	5.91	0.11	2.65	0.48	0.00	45.13	100%
Chemlock 252X	7.99	77.00%	0.0%	77.00%	0.0%	13.70%	5.97E-06	5000.000	6.15	6.15	0.18	4.41	0.80	0.00	44.91	100%
Xylene	7.22	100.00%	0.0%	100.00%	0.0%	0.00%	2.22E-05	5000.000	7.22	7.22	0.80	19.23	3.51	0.00	n/a	100%
MEK	6.70	100.00%	0.0%	100.00%	0.0%	0.00%	5.88E-05	5000.000	6.70	6.70	1.97	47.28	8.63	0.00	n/a	100%
Five (5) Small Spray Booths (012 - 016)																
Chemlok 205	7.81	75.70%	0.0%	75.70%	0.0%	13.10%	3.63E-05	5000.000	5.91	5.91	1.07	25.75	4.70	1.28	45.13	15%
Chemlock 252X	7.99	77.00%	0.0%	77.00%	0.0%	13.70%	3.38E-05	5000.000	6.15	6.15	1.04	24.95	4.55	1.16	44.91	15%
Xylene	7.22	100.00%	0.0%	100.00%	0.0%	0.00%	4.34E-05	5000.000	7.22	7.22	1.57	37.60	6.86	0.00	n/a	15%
MEK	6.70	100.00%	0.0%	100.00%	0.0%	0.00%	8.81E-05	5000.000	6.70	6.70	2.95	70.83	12.93	0.00	n/a	15%
One (1) Large Spray Booth (017)																
Ethyl Acetate	7.47	100.00%	0.0%	100.00%	0.0%	0.00%	5.02E-07	5000.000	7.47	7.47	0.02	0.45	0.08	0.00	n/a	100%
Methanol	6.63	100.00%	0.0%	100.00%	0.0%	0.00%	3.98E-06	5000.000	6.63	6.63	0.13	3.17	0.58	0.00	n/a	100%
Chemlok 607	6.93	88.60%	0.0%	88.60%	0.0%	8.80%	1.00E-06	5000.000	6.14	6.14	0.03	0.74	0.13	0.00	69.77	100%
Hexane	5.48	100.00%	0.0%	100.00%	0.0%	0.00%	2.09E-07	5000.000	5.48	5.48	0.01	0.14	0.03	0.00	n/a	100%
RTV Blue Gasket Maker	8.50	4.60%	0.0%	4.60%	0.0%	95.40%	2.09E-07	5000.000	0.39	0.39	0.00	0.01	0.00	0.00	0.41	100%
92-009 Dispersion Coating	6.64	100.00%	0.0%	100.00%	0.0%	0.00%	2.51E-07	5000.000	6.64	6.64	0.01	0.20	0.04	0.00	n/a	100%
DBTL Catalyst	8.85	100.00%	0.0%	100.00%	0.0%	0.00%	4.18E-08	5000.000	8.85	8.85	0.00	0.04	0.01	0.00	n/a	100%
									Control Efficiency	90.00%						
State Potential Emissions			**Add worst case coating to all solvents**						**Uncontrolled**		**10.5**	**252**	**46.0**	**2.44**		
									Controlled		**10.5**	**252**	**46.0**	**0.244**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Firestone Industrial Products Company
Address City IN Zip: 1700 Firestone Blvd., Noblesville, Indiana 46060
Part 70: T 057-5997
Plt ID: 057-00006
Reviewer: CarrieAnn Ortolani
Date: May 31, 1996

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Methanol	Weight % Hexane	Weight % Xylene	Weight % Ethyl Benzene	Weight % MEK	Weight % MIBK	Methanol Emissions (tons/yr)	Hexane Emissions (tons/yr)	Xylene Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	MEK Emissions (tons/yr)	MIBK Emissions (tons/yr)
Manual Cement Dip Unit (010)															
Chemlok 205	7.81	1.45E-06	5000	0.00%	0.00%	15.00%	3.00%	2.00%	60.00%	0.00	0.00	0.04	0.01	0.00	0.15
Chemlock 252X	7.99	1.62E-06	5000	0.00%	0.00%	65.00%	15.00%	0.00%	0.00%	0.00	0.00	0.18	0.04	0.00	0.00
Xylene	7.22	3.38E-06	5000	0.00%	0.00%	80.00%	20.00%	0.00%	0.00%	0.00	0.00	0.43	0.11	0.00	0.00
MEK	6.70	1.19E-05	5000	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00	0.00	0.00	0.00	1.75	0.00
Automatic Cement Dip Unit (011)															
Chemlok 205	7.81	3.73E-06	5000	0.00%	0.00%	15.00%	3.00%	2.00%	60.00%	0.00	0.00	0.10	0.02	0.01	0.38
Chemlock 252X	7.99	5.97E-06	5000	0.00%	0.00%	65.00%	15.00%	0.00%	0.00%	0.00	0.00	0.68	0.16	0.00	0.00
Xylene	7.22	2.22E-05	5000	0.00%	0.00%	80.00%	20.00%	0.00%	0.00%	0.00	0.00	2.81	0.70	0.00	0.00
MEK	6.70	5.88E-05	5000	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00	0.00	0.00	0.00	8.63	0.00
Five (5) Small Spray Booths (012 - 016)															
Chemlok 205	7.81	3.63E-05	5000	0.00%	0.00%	15.00%	3.00%	2.00%	60.00%	0.00	0.00	0.93	0.19	0.12	3.73
Chemlock 252X	7.99	3.38E-05	5000	0.00%	0.00%	65.00%	15.00%	0.00%	0.00%	0.00	0.00	3.84	0.89	0.00	0.00
Xylene	7.22	4.34E-05	5000	0.00%	0.00%	80.00%	20.00%	0.00%	0.00%	0.00	0.00	5.49	1.37	0.00	0.00
MEK	6.70	8.81E-05	5000	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00	0.00	0.00	0.00	12.93	0.00
One (1) Large Spray Booth (017)															
Ethyl Acetate	7.47	5.02E-07	5000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Methanol	6.63	3.98E-06	5000	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.58	0.00	0.00	0.00	0.00	0.00
Chemlok 607	6.93	1.00E-06	5000	80.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.12	0.00	0.00	0.00	0.00	0.00
Hexane	5.48	2.09E-07	5000	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.03	0.00	0.00	0.00	0.00
RTV Blue Gasket Maker	8.50	2.09E-07	5000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
92-009 Dispersion Coating	6.64	2.51E-07	5000	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
DBTL Catalyst	8.85	4.18E-08	5000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
									Totals	**0.699**	**0.025**	**14.5**	**3.48**	**23.4**	**4.26**

Lead is not included in HAP calculations for dipping operations, because led is a particulate and will not be emitted unless there is overspray.

Material	Density (lbs/gal)	Gallons of Material (gal/year)		Weight % Xylene	Weight % Ethyl Benzene	Weight % MEK	Weight % Trichloro Ethylene	Weight % Toluene		Xylene Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	MEK emissions (tons/yr)	Trichloro ethylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	
Swabbing Operation															
Tol-U-Sol	6.2	10247		0.00%	0.00%	0.00%	0.00%	0.00%		0.00	0.00	0.00	0.00	0.00	
Chemlok 234B	9.1	255		40.00%	10.00%	0.00%	30.00%	0.00%		0.46	0.12	0.00	0.35	0.00	
Toluene	7.2	483		0.00%	0.00%	0.00%	0.00%	100.00%		0.00	0.00	0.00	0.00	1.74	
MEK	6.7	580		0.00%	0.00%	100.00%	0.00%	0.00%		0.00	0.00	1.94	0.00	0.00	
Chemlok 250	9.5	114		35.00%	10.00%	0.00%	35.00%	0.00%		0.19	0.05	0.00	0.19	0.00	
Parts Washers															
Safety Kleen Premium Solvent (5 units)	6.8	18		0.00%	0.00%	0.00%	0.00%	0.00%		0.00	0.00	0.00	0.00	0.00	
Safety Kleen Immersion Cleaner (1 unit)	7.9	2		0.00%	0.00%	0.00%	0.00%	0.00%		0.00	0.00	0.00	0.00	0.00	
										0.652	**0.170**	**1.94**	**0.536**	**1.74**	

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: State Potential Emissions Calculations
VOC
From Solvent Usage

Company Name: Firestone Industrial Products Company
Address City IN Zip: 1700 Firestone Blvd., Noblesville, Indiana 46060
Part 70: T 057-5997
Plt ID: 057-00006
Reviewer: CarrieAnn Ortolani
Date: May 31, 1996

Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Max Usage (gal/yr)	Potential VOC pounds per year	Potential VOC tons per year
One (1) swabbing operation							
Tol-U-Sol	6.2	100.00%	0.0%	100.0%	10247.0	63224	31.6
Chemlok 234B	9.1	74.30%	0.0%	74.3%	255.0	1720	0.9
Toluene	7.2	100.00%	0.0%	100.0%	483.0	3487	1.7
MEK	6.7	100.00%	0.0%	100.0%	580.0	3886	1.9
Chemlok 250	9.5	74.50%	0.0%	74.5%	114.0	803	0.4
Parts Washers							
afety Kleen Premium Solvent (5 unit	6.8	100.00%	0.0%	100.0%	18.0	122	0.1
afety Kleen Immersion Cleaner (1 ur	7.9	92.00%	0.0%	92.0%	2.0	15	0.0
State Potential Emissions						**73257**	**36.6**

Methodology

Potential VOC Pounds per Year = Solvent Density (lbs/gallon) * weight % volatiles * solvent consumption (gallons/Year)
Potential VOC Tons per Year = Potential VOC Pounds per Year * (1 ton/2000 lbs)

Emissions Unit	Capacity (gal/min)	Capacity (L/min)	VOC Concentration (mg/L)	VOC Concentration (lbs/L)	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
Air Strippers (008,009)	1400	5300	7.75	1.71E-05	5.44	131	23.8

Methodology

Capacity (L/min) = Capacity (gal/min) x 3.7854 L/gal
VOC Concentration (mg/L) is the maximum VOC concentration detected in ground water as supplied by the applicant.
VOC concentration (lbs/L) = VOC concentration (mg/L) x 2.2046E-6 lbs/mg
Potential VOC (lbs/hour) = Capacity (L/min) x VOC concentration (lbs/L) x 60 min/hour
Potential VOC (lbs/day) = Potential VOC lbs/hour x 24 hours/day
Potential VOC tons per year = Potential VOC lbs/hour x 8760 hours/year/ 2000 lbs/ton

Appendix A: Emission Calculations
HAP Emission Calculations
Individual HAP emissions when using worst case total HAP materials

Company Name: Firestone Industrial Products Company
Address City IN Zip: 1700 Firestone Blvd., Noblesville, Indiana 46060
Part 70: T 057-5997
Plt ID: 057-00006
Reviewer: CarrieAnn Ortolani
Date: May 31, 1996

Press Curing

HAP	Worst Case Emission Factor (lb/lb rubber)	Potential Rubber Throughput (lbs/hr)	Potential Emissions (lbs/hr)	Potential Emissions (tons/yr)
1,1,1 Trichloroethane	3.56E-04	1600	0.570	2.495
1,4 Dichlorobenzene	5.78E-08	1600	0.0001	0.0004
2-Butanone	1.18E-06	1600	0.002	0.008
Acetophenone	2.17E-06	1600	0.003	0.015
bis(2-Ethylhexyl)phthalate	1.78E-05	1600	0.028	0.125
Carbon Disulfide	9.50E-04	1600	1.52	6.66
Carbonyl Sulfide	4.39E-05	1600	0.070	0.308
Chloromethane	8.77E-07	1600	0.001	0.006
Cumene	4.55E-08	1600	0.0001	0.0003
Di-n-butylphthalate	2.58E-07	1600	0.0004	0.002
Dibenzofuran	5.64E-08	1600	0.0001	0.0004
Dimethylphthalate	7.78E-08	1600	0.0001	0.001
Hexane	2.69E-06	1600	0.004	0.019
Methylene Chloride	1.67E-06	1600	0.003	0.012
Naphthalene	3.71E-07	1600	0.001	0.003
o-Toluidine	2.21E-06	1600	0.004	0.015
Phenol	7.79E-07	1600	0.001	0.005
Toluene	2.98E-06	1600	0.005	0.021

Vulcanizing

HAP	Worst Case Emission Factor (lb/lb rubber)	Potential Rubber Throughput (lbs/hr)	Potential Emissions (lbs/hr)	Potential Emissions (tons/yr)
1,4 Dichlorobenzene	2.53E-08	900	0.00002	0.0001
2-Butanone	1.24E-06	900	0.001	0.005
2-Methylphenol	6.93E-09	900	0.00001	0.00003
Acetylaldehyde	3.22E-07	900	0.000	0.001
Acetophenone	9.76E-08	900	0.0001	0.0004
Benzene	2.07E-05	900	0.019	0.082
Biphenyl	3.14E-08	900	0.00003	0.0001
bis(2-Ethylhexyl)phthalate	2.73E-07	900	0.0002	0.001
Carbon Disulfide	5.93E-03	900	5.34	23.4
Carbonyl Sulfide	4.17E-05	900	0.038	0.164
Cumene	1.46E-06	900	0.001	0.006
Dibenzofuran	2.81E-09	900	0.000003	0.00001
Dimethylphthalate	3.02E-09	900	0.000003	0.00001
Epichlorohydrin	1.85E-06	900	0.002	0.007
Ethylbenzene	2.55E-06	900	0.002	0.010
Hexane	3.22E-06	900	0.003	0.013
Isooctane	5.23E-07	900	0.000	0.002
Xylenes	1.68E-05	900	0.015	0.066
Naphthalene	1.64E-07	900	0.0001	0.001
Phenol	4.75E-08	900	0.00004	0.0002
Styrene	1.86E-07	900	0.0002	0.001
t-Butyl Methyl Ether	7.31E-09	900	0.00001	0.00003
Toluene	1.59E-05	900	0.014	0.063

Mixing and Milling

HAP	Worst Case Emission Factor (lb/lb rubber)	Potential Rubber Throughput (lbs/hr)	Potential Emissions (lbs/hr)	Potential Emissions (tons/yr)
1,1,1 Trichloroethane	6.03E-08	10000	0.001	0.003
2-Butanone	1.04E-06	10000	0.010	0.046
4-Methyl-2-Pentanone	1.65E-07	10000	0.002	0.007
Acetophenone	1.45E-08	10000	0.0001	0.001
Aniline	5.13E-07	10000	0.005	0.022
Benzene	4.62E-08	10000	0.0005	0.002
bis(2-Ethylhexyl)phthalate	2.40E-09	10000	0.00002	0.0001
Cadmium Compounds	2.65E-09	10000	0.00003	0.0001
Chloroethane	2.01E-07	10000	0.002	0.009
Chloromethane	8.86E-07	10000	0.009	0.039
Chromium Compounds	4.20E-08	10000	0.0004	0.002
Cumene	9.43E-09	10000	0.0001	0.0004
Ethyl Acrylate	1.45E-07	10000	0.001	0.006
Hexane	1.13E-04	10000	1.13	4.95
Xylenes	1.06E-06	10000	0.011	0.046
Methylene Chloride	1.65E-05	10000	0.165	0.723
Naphthalene	4.01E-08	10000	0.0004	0.002
Nickel Compounds	3.21E-08	10000	0.0003	0.001
Phenol	1.27E-06	10000	0.013	0.056
Tetrachloroethene	4.10E-06	10000	0.041	0.180
Toluene	1.04E-06	10000	0.010	0.046

Milling

HAP	Worst Case Emission Factor (lb/lb rubber)	Potential Rubber Throughput (lbs/hr)	Potential Emissions (lbs/hr)	Potential Emissions (tons/yr)
1,1,1 Trichloroethane	3.13E-08	10000	0.0003	0.001
2-Butanone	5.39E-07	10000	0.005	0.024
4-Methyl-2-pentanone	8.58E-08	10000	0.001	0.004
Acetophenone	7.53E-09	10000	0.0001	0.0003
Aniline	2.66E-07	10000	0.003	0.012
bis(2-Ethylhexyl)phthalate	1.25E-09	10000	0.00001	0.00005
Chloroethane	1.04E-07	10000	0.001	0.005
Chloromethane	4.60E-07	10000	0.005	0.020
Cumene	4.89E-09	10000	0.00005	0.0002
Ethylacrylate	2.45E-06	10000	0.025	0.107
Hexane	5.85E-05	10000	0.585	2.562
Xylenes	5.11E-07	10000	0.005	0.022
Methylene Chloride	8.58E-06	10000	0.086	0.376
Naphthalene	2.08E-08	10000	0.0002	0.001
Phenol	6.58E-07	10000	0.007	0.029
Toluene	5.37E-07	10000	0.005	0.024

Emission Factors from Tables 4.12-8 and 4.12 - 4 of AP-42 draft Section 4.12
These calculations are for the maximum potential emissions of each individual HAP considering the compounds used at this source.